

<p style="text-align: right;">Page 154</p> <p>1 Q. I show you another exhibit. 2 (Press Release was marked Exhibit Number 3 17 for identification.) 4 MR. STEWART: I'm going to want to 5 take a break sometime between now and the next 6 fifteen minutes. 7 Q. Do you recognize this document, Mr. Herrera? 8 A. Yes. 9 Q. Is it also a coincidence, Mr. Herrera, that on 10 the exact same date that you sent a notice of 11 termination to Ethypharm and that you signed a 12 confidentiality agreement with one of the 13 Ethypharm's clients that Bentley in the United 14 States announced the filing of four new patents 15 for omeprazole and lansoprazole? 16 A. That is a coincidence? That's the question? 17 Q. Yes. 18 A. I suppose it is. 19 Q. It's not part of an organized plan? 20 A. No. I am not responsible for any publication. 21 Q. Who's responsible for this publication, 22 Exhibit 17? 23 A. In the United States. 24 Q. Bentley?</p>	<p style="text-align: right;">Page 156</p> <p>1 dated December 6, 2001, and Enclosure 2 were marked Exhibit Number 18 for 3 identification.) 4 Q. Mr. Herrera, this is a document in English, and 5 if you need any help translating any portion, 6 you can tell us. My question to you generally 7 is whether you recognize this document. 8 A. Yes, I recognize it. 9 Q. What is it? 10 A. As this letter states, it is a confidentiality 11 agreement for omeprazole, Enalapril, 12 Simvastatine between us and PharmAlliance. 13 Q. The second and third page of this document are 14 actually not confidentiality agreements or they 15 appear not to be confidentiality agreements, but 16 this is the way the document was produced to us 17 by Belmac. Can you explain what the last two 18 pages of Exhibit what -- 19 THE TRANSLATOR: 18. 20 Q. -- 18 are? 21 A. Is an agreement of supplying, marketing, and 22 distribution. 23 Q. Between PharmAlliance and Laboratorios Belmac? 24 A. Correct.</p>
<p style="text-align: right;">Page 155</p> <p>1 A. Si. 2 Q. Mr. Murphy? 3 A. I don't know. 4 Q. Did you see this Exhibit 17 before it was 5 released to the public? 6 A. No. 7 Q. Is the first sentence true, which reads that, 8 "Bentley Pharmaceuticals, Inc., a drug delivery 9 company with a commercial presence in Europe, 10 announced today that through its wholly owned 11 Spanish subsidiary, Laboratorios Belmac, it has 12 submitted four new patents over the past year 13 for improved formulations of orally delivered 14 products"? Is that a true statement? 15 A. I believe so. 16 MR. STEWART: We can take a break now. 17 THE VIDEOGRAPHER: The time is 18 2:15 p.m. We're going off the record. 19 (Recess) 20 THE VIDEOGRAPHER: The time is 21 2:31 p.m. We're back on the record. 22 Q. Mr. Herrera, let me show you another document 23 here. 24 (Letter to Mr. Herrera from Ilhem Gadry,</p>	<p style="text-align: right;">Page 157</p> <p>1 Q. Relating to omeprazole, correct? 2 A. Correct. 3 Q. Do you know if and when this document was 4 signed? 5 A. Well, from what I can observe, it was in 6 February, but I don't see my signature in here. 7 Q. So you think it's February 2002. Is that 8 correct or no? 9 A. Correct. 10 Q. Do you know whether this document was ultimately 11 signed? 12 A. I believe it was. 13 Q. And do you believe it was around February of 14 2002? 15 A. Yes, it could have been more or less. 16 Q. Let me show you another document. 17 (Side Letter was marked Exhibit Number 18 19 for identification.) 19 Q. Again, this is a document in English, correct? 20 A. Yes. 21 Q. And if you need any help translating any portion 22 in order to answer my questions, please just say 23 so. Okay? Okay? 24 THE WITNESS: Uh-huh.</p>

23 (Pages 154 to 157)

<p style="text-align: right;">Page 158</p> <p>1 Q. I think you have to say yes for the translator. 2 A. Yes. 3 Q. Do you recognize Exhibit 19? 4 A. Honestly, I don't remember it. 5 Q. It has a line for your signature on the second 6 page, correct? 7 A. Correct. 8 Q. Do you know whether this document was signed? 9 A. I don't think so, but I'm not sure. 10 Q. And this indicates that it's a side letter to an 11 agreement between Leciva and Uquifa. Is this 12 correct? 13 A. Yes. 14 Q. And Leciva and Uquifa were both clients of 15 Ethypharm, correct? 16 A. Correct. 17 Q. And this indicates that it's to be concluded in 18 January of 2003. I want to refer you to 19 Paragraph 3, and I'm not sure -- this is very 20 legal language. So I'll ask the translator to 21 do the best she can. It says, "Belmac shall 22 indemnify and hold Leciva harmless." 23 THE TRANSLATOR: It's almost identify? 24 MR. BOSTWICK: Indemnify, which in</p>	<p style="text-align: right;">Page 160</p> <p>1 Fair point here. 2 Q. Do you recall discussing agreements with Leciva 3 and Uquifa relating to the manufacture and sale 4 of omeprazole around 2002 or 2003? 5 A. I don't remember. 6 Q. Do you have agreements with Leciva and Uquifa 7 today for the sale of omeprazole? 8 A. With Leciva, I have no agreement. And Uquifa 9 supplies me with the raw material. 10 Q. This -- what do you understand generally 11 Paragraph 3 to mean? 12 A. That Belmac will maintain -- indemnify any loss, 13 any liability or any claim or anything that can 14 come as a result. 15 Q. Why -- was this agreement under consideration 16 while you were general manager; do you know? 17 A. First of all, I do not remember this document. 18 And after we terminated our contracts, we 19 continue supplying clients of Ethypharm. Among 20 those were Leciva, and we continued supplying 21 what they request. And this, I don't remember. 22 You know, maybe somebody send it to me. It 23 could have been Uquifa. I don't know, but I 24 don't remember having it been signed, and we</p>
<p style="text-align: right;">Page 159</p> <p>1 English means -- how would you describe? 2 Q. Do you understand this paragraph in English, 3 Mr. Herrera? 4 A. More or less, I do. 5 Q. More or less. What do you understand that 6 paragraph to mean in general? 7 MR. STEWART: I'm going to object. 8 The witness has testified that he doesn't 9 recognize this document. There really hasn't 10 been any foundation as to the agreement that 11 this document purports to be a side letter to, 12 and while we recognize the names Belmac and 13 Leciva are names we've heard before in 14 connection with this case, there really isn't 15 any -- you haven't established any connection 16 that I can see anyway between this witness and 17 the document. And so the purpose of your 18 question to have him tell his understanding of 19 this paragraph, I don't see it as relevant to 20 anything. 21 MR. BOSTWICK: Why don't I first -- 22 without getting into a long colloquy, one answer 23 is that his signature line is on the last page, 24 but let me establish a little more foundation.</p>	<p style="text-align: right;">Page 161</p> <p>1 have no relationships with Leciva. 2 Q. Can you turn to the second page of the document? 3 The person who is listed as the signatory is Jan 4 Sotola. Do you see that? 5 A. Yes. 6 Q. Do you know that person? 7 A. I don't know this person. 8 Q. Is there somebody in your department either in 9 Madrid or Zaragoza that is in charge of dealing 10 with clients like Leciva or Uquifa or 11 PharmAlliance? 12 THE TRANSLATOR: What was the third 13 one? 14 MR. BOSTWICK: PharmAlliance. 15 A. No. 16 Q. Do you personally do all the customer relations 17 work for Laboratorios Belmac? 18 A. No. You have asked me in specific about three 19 clients, Leciva, Uquifa, and PharmAlliance. 20 Q. For other clients that you have relating to 21 omeprazole, is there a commercial director or a 22 commercial department that is in charge of 23 relationships with omeprazole clients? 24 A. With the clients in relationship to omeprazole,</p>

24 (Pages 158 to 161)

<p style="text-align: right;">Page 162</p> <p>1 no. With all -- lots of our clients of many of</p> <p>2 our products.</p> <p>3 Q. Who -- is it one person or more than one person?</p> <p>4 A. Three people.</p> <p>5 Q. Who are they today?</p> <p>6 A. Ignacio Alvarez, Roman Tutor, and our plant</p> <p>7 director in terms of client satisfaction,</p> <p>8 Antonio Cabodevilla.</p> <p>9 MR. BOSTWICK: Could I have the last</p> <p>10 answer read back?</p> <p>11 (Reporter read back the last answer.)</p> <p>12 Q. Could you spell the last name of Mr. Roman</p> <p>13 Tutor?</p> <p>14 A. T U T O R.</p> <p>15 Q. Have those same three people been responsible</p> <p>16 for client relations since the year 2000?</p> <p>17 A. No.</p> <p>18 Q. How has it changed?</p> <p>19 A. These people are responsible for relationship</p> <p>20 with clients; Roman Tutor, approximately since</p> <p>21 the year 2004; Ignacio Alvarez, approximately</p> <p>22 since the year 2003, and Antonio Cabodevilla,</p> <p>23 since the year 2001 or 2002.</p> <p>24 Q. Who was in charge of client relations for</p>	<p style="text-align: right;">Page 164</p> <p>1 late 2001 and early 2002?</p> <p>2 A. Once again, I informed to my president, the</p> <p>3 president of Belmac, how things are going and</p> <p>4 any issues. So I imagine that I did converse</p> <p>5 with him about it.</p> <p>6 Q. So because Mr. Murphy was both president of</p> <p>7 Laboratorios Belmac and Bentley, you understood</p> <p>8 that Bentley knew that Belmac was in the process</p> <p>9 of renegotiating omeprazole contracts with</p> <p>10 Ethypharm customers?</p> <p>11 MR. STEWART: Objection as to</p> <p>12 "renegotiation" and to the extent it's been</p> <p>13 asked and answered.</p> <p>14 Q. Is that correct?</p> <p>15 A. No, it's not correct.</p> <p>16 Q. What's wrong with that statement?</p> <p>17 A. As I will say once more again, I communicate to</p> <p>18 my president of Laboratorios Belmac the progress</p> <p>19 of our business, and within those</p> <p>20 communications, I suppose that I do inform him</p> <p>21 that there are clients of Ethypharm that have</p> <p>22 come to us because of the problems with supply.</p> <p>23 Q. Around late 2001 and early 2002?</p> <p>24 A. It could have been.</p>
<p style="text-align: right;">Page 163</p> <p>1 Laboratorios Belmac from 2000 to 2003?</p> <p>2 A. I personally.</p> <p>3 Q. Did anyone assist you in that role?</p> <p>4 A. Unfortunately, no.</p> <p>5 Q. Going back --</p> <p>6 MR. BOSTWICK: Can we go off the</p> <p>7 record for just a moment?</p> <p>8 THE VIDEOGRAPHER: Sure. The time is</p> <p>9 2:52 p.m. We're going off the record.</p> <p>10 (Discussion off the record)</p> <p>11 THE VIDEOGRAPHER: The time is</p> <p>12 2:53 p.m. We're back on the record.</p> <p>13 Q. Referring you to Document or -- Exhibit Number</p> <p>14 16, Mr. Herrera, did Bentley understand that</p> <p>15 Belmac was in the process of renegotiating</p> <p>16 omeprazole contracts with Ethypharm clients</p> <p>17 during late 2001 and early 2002?</p> <p>18 MR. STEWART: Objection to the term</p> <p>19 "renegotiation."</p> <p>20 A. Some clients of Ethypharm will come to us, to</p> <p>21 Belmac Laboratories, as a consequence of the</p> <p>22 problems that they had experienced of supplying</p> <p>23 with Ethypharm Laboratories.</p> <p>24 Q. Was Bentley Pharmaceuticals aware of this during</p>	<p style="text-align: right;">Page 165</p> <p>1 Q. Okay. Let me show you another document.</p> <p>2 (Copy of E-mail from Mr. Fitzgibbons,</p> <p>3 dated January 22, 2002, and Attachment</p> <p>4 were marked Exhibit Number 20 for</p> <p>5 identification.)</p> <p>6 Q. And once again, Mr. Herrera, this is a document</p> <p>7 in English, of course, and if you need any help</p> <p>8 translating any portion in order to answer my</p> <p>9 questions, simply ask. Okay?</p> <p>10 A. That's how I will do.</p> <p>11 Q. My first question is, do you recognize this</p> <p>12 document?</p> <p>13 A. No, I don't recognize it.</p> <p>14 Q. If you turn to Page 2 -- you're on the correct</p> <p>15 page. The second page of the exhibit, in other</p> <p>16 words. You see the subject says "operations</p> <p>17 update, January 22nd, 2002"? Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. And it's addressed to Bentley Pharmaceuticals</p> <p>20 board of directors?</p> <p>21 A. That's what is written here.</p> <p>22 Q. Have -- are you on the Bentley board of</p> <p>23 directors today because you're also vice</p> <p>24 president of Bentley or not?</p>

25 (Pages 162 to 165)

<p style="text-align: right;">Page 166</p> <p>1 A. No.</p> <p>2 Q. Have you ever seen a Bentley Pharmaceuticals</p> <p>3 operations update?</p> <p>4 A. No.</p> <p>5 Q. Okay. Do you see in Number 1e, it says,</p> <p>6 "Ethypharm customers for omeprazole in process</p> <p>7 of recontracting with Laboratorios Belmac"? Do</p> <p>8 you see that sentence?</p> <p>9 A. Yes.</p> <p>10 Q. And that was true in January 22, 2002?</p> <p>11 A. That's what it states here.</p> <p>12 Q. And that's consistent with your memory?</p> <p>13 A. It's consistent with --</p> <p>14 Q. I'm sorry. Did you say "consistent" or</p> <p>15 "inconsistent"?</p> <p>16 A. I'm sorry. It is consistent with me</p> <p>17 communicating with my president of Belmac of</p> <p>18 clients from Ethypharm that are approaching us</p> <p>19 because of the problems that -- supplying</p> <p>20 problems that they are experiencing with</p> <p>21 Ethypharm.</p> <p>22 Q. I'll show you another document after we have it</p> <p>23 marked.</p> <p>24 (Document titled Contrato de</p>	<p style="text-align: right;">Page 168</p> <p>1 would like to attend of commercial exploration</p> <p>2 of technologies of a lot of commercial interest.</p> <p>3 Q. Is it your testimony that this -- entering this</p> <p>4 agreement was your idea?</p> <p>5 A. Yes.</p> <p>6 Q. Why aren't you a signatory to the agreement?</p> <p>7 A. I don't know.</p> <p>8 Q. How much money is Laboratorios Belmac obligated</p> <p>9 to pay Bentley under this agreement?</p> <p>10 A. It's stated right here.</p> <p>11 Q. Where?</p> <p>12 A. Article 4.</p> <p>13 Q. And can you tell me how much that is?</p> <p>14 A. 500,000 euros.</p> <p>15 Q. And that's currently about \$600,000, is that</p> <p>16 correct, U.S.?</p> <p>17 A. Yes.</p> <p>18 Q. And that's every year?</p> <p>19 A. Yes. Not for all years. It is for each -- per</p> <p>20 year.</p> <p>21 Q. There are also some services to be given from</p> <p>22 Bentley to Belmac, correct?</p> <p>23 A. Correct.</p> <p>24 Q. What services does Bentley give to Belmac for</p>
<p style="text-align: right;">Page 167</p> <p>1 Transferencia de Tecnologia y Cesion de</p> <p>2 Know How was marked Exhibit Number 21</p> <p>3 for identification.)</p> <p>4 Q. And I ask you if you recognize it.</p> <p>5 A. Yes, I do recognize it.</p> <p>6 Q. Can you tell me what you understand this</p> <p>7 document to be?</p> <p>8 A. A contract -- a transfer of technology and</p> <p>9 assignment of know-how agreement.</p> <p>10 Q. And what technology and assignment of know-how</p> <p>11 is being transferred to what party?</p> <p>12 A. Bentley transfer to Belmac Laboratories</p> <p>13 technology.</p> <p>14 Q. What type of technology?</p> <p>15 A. Enhancers with the increased ab -- for the</p> <p>16 increase of absorption -- transdermal</p> <p>17 absorption.</p> <p>18 Q. Transdermal absorption, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And how much -- strike that. Did you</p> <p>21 participate in the decision to enter into this</p> <p>22 agreement between Bentley Pharmaceuticals and</p> <p>23 Laboratorios Belmac?</p> <p>24 A. I communicated to my president of Belmac that I</p>	<p style="text-align: right;">Page 169</p> <p>1 this price?</p> <p>2 A. To help the staff preparation of this</p> <p>3 technology.</p> <p>4 Q. Is this part of a management fee as well?</p> <p>5 A. There is technology transfer here.</p> <p>6 Q. I show you another document.</p> <p>7 (Letter to Mr. Herrera from</p> <p>8 Mr. DeBregeas and Mr. Leduc was marked</p> <p>9 Exhibit Number 22 for identification.)</p> <p>10 Q. And I will ask you if you recognize that</p> <p>11 document.</p> <p>12 A. Yes, I do recognize it.</p> <p>13 Q. What is this?</p> <p>14 A. I consider it an invitation from Mr. DeBregeas</p> <p>15 and Mr. Leduc to have a meeting prior to the</p> <p>16 date of our contract's termination.</p> <p>17 Q. Did you have such a meeting?</p> <p>18 A. Yes.</p> <p>19 Q. Where did that meeting take place?</p> <p>20 A. In St. Cloud in Paris, which are the office of</p> <p>21 Ethypharm.</p> <p>22 Q. Who attended that meeting?</p> <p>23 A. From Belmac, Dr. Fernando Berenguer and myself,</p> <p>24 and from Ethypharm, Gerard Leduc, Patrice</p>

26 (Pages 166 to 169)

<p style="text-align: right;">Page 170</p> <p>1 DeBregeas, an American attorney, and Roseline 2 Joannesse. 3 Q. Were Mr. Leduc and Mr. DeBregeas in attendance 4 the entire time of the meeting or did they go in 5 and out? 6 A. If my memory serves me well, Mr. Leduc 7 assisted -- attended the entire meeting, and 8 Mr. DeBregeas was absent maybe two or three 9 times during the meeting for a very short period 10 of time. 11 Q. How long did the meeting last? 12 A. Approximately, I'm thinking that it lasted two 13 and a half hours to three hours. 14 Q. How did the meeting start? 15 A. The meeting began introducing ourselves, you 16 know, introducing ourself to the person that we 17 didn't know, which was the American attorney. 18 We asked, you know, what was the reason of the 19 presence of this gentleman. And Gerard Leduc or 20 Patrice DeBregeas, one of the two -- I think it 21 was Patrice DeBregeas -- he answered that it was 22 a friend that was present over there and they 23 just had invited him to the meeting, that they 24 invited him to the meeting.</p>	<p style="text-align: right;">Page 172</p> <p>1 Q. This is what Ethypharm is explaining to you? Is 2 the answer yes? 3 A. Yes. 4 Q. Continue, please. 5 A. This was not just a problem, you know, involving 6 Spain, Belmac Laboratories, that they were also 7 willing to sue in the United States our parent 8 company. At that moment, I mentioned to them 9 that these were relationships between Spanish 10 companies and that we had nothing to do with our 11 parent company on these negotiations. At the 12 same time, I requested a recess, and I went out 13 to speak with Fernando Berenguer. 14 Q. Did you -- what did you say to Fernando 15 Berenguer? Did you get him on the phone? 16 A. No, we were together at the meeting. 17 Q. Ahh, ahh. Okay. I'm sorry. When you went out 18 of the room to talk to Fernando Berenguer, what 19 did you discuss with him? 20 A. We were trying to decide if at that moment we 21 will terminate the meeting and we would leave, 22 and we decided just trying to find a solution so 23 we would not live without supplies, the clients 24 of Ethypharm. We decided to return to the</p>
<p style="text-align: right;">Page 171</p> <p>1 Q. Then what happened? 2 A. We asked what was the purpose of inviting a 3 friend to a meeting when we could have brought 4 our friends to the meeting. I was speaking 5 specifically of our own attorneys. Because I 6 couldn't understand what was the reason of an 7 attorney being present in a meeting that the 8 intention was to try to resolve a problem. 9 Q. Did you get an answer? 10 A. Yes. They said to me, "Well, you know, we want 11 to explain to you what is the situation." 12 Q. And what did they explain? 13 A. They explained that a cancellation or 14 termination of our contract would be produced in 15 a short period of time and we were infringement 16 to the cancellation -- 17 MR. STEWART: Excuse me? 18 A. And we were infringement to the cancellation. 19 THE TRANSLATOR: I'm just asking him 20 to explain what he means by "infringio," because 21 I believe I don't understand specifically his 22 meaning. 23 A. That we didn't have the right to use their 24 know-how and their technology.</p>	<p style="text-align: right;">Page 173</p> <p>1 meeting. 2 Q. And did you return to the meeting? 3 A. Yes. 4 Q. What happened next? 5 A. We explained to them that we were not in 6 agreement with what they had presented, and the 7 same thing that we had offered, the same thing 8 that we had offered them, a new supply 9 agreement, the same thing that we had offered 10 them at the letter of no continuance of the 11 contract. We were offering them at that moment 12 the same thing, as the opportunity to a new 13 supply contract from Belmac to Ethypharm. 14 Q. What was Ethypharm's response? 15 A. The American attorney, that was not acceptable 16 because their know-how. 17 Q. Ethypharm's know-how? 18 One moment. You have to give an 19 answer for the court reporter. I asked, did you 20 mean the know-how of Ethypharm? 21 A. Yes. Yes, what I tried to say to you is that 22 the American attorney said that it was not 23 acceptable because it was the know-how of 24 Ethypharm.</p>

27 (Pages 170 to 173)

<p style="text-align: right;">Page 174</p> <p>1 Q. Okay. Thank you.</p> <p>2 A. And my response was that the know-how, it was</p> <p>3 the know-how of Belmac. As the document at that</p> <p>4 moment, I show it to him, at which Ethypharm</p> <p>5 Spain, signed by Adolfo de Basilio in September</p> <p>6 of 2000 -- no, excuse me, September of 1998,</p> <p>7 recognizing that we were submitting to them all</p> <p>8 the manufacturing methods and analytical methods</p> <p>9 with the agreement -- the confidentiality</p> <p>10 agreement of ten years.</p> <p>11 At that moment, I passed the mentioned</p> <p>12 document to the American attorney. The American</p> <p>13 attorney read the document and said to Roseline</p> <p>14 Joannesse that he was not familiar with that</p> <p>15 document, and Roseline Joannesse felt very</p> <p>16 uncomfortable; and she exited the room at that</p> <p>17 moment.</p> <p>18 Q. Okay. Do you recall what happened after this?</p> <p>19 A. It was a situation in which about five minutes</p> <p>20 later Gerard Leduc and Patrice DeBregeas said to</p> <p>21 Fernando Berenguer and to myself that it was</p> <p>22 time to go and eat, and we went to eat at a</p> <p>23 restaurant that is right at the corner, which is</p> <p>24 the same restaurant as always. And there, we</p>	<p style="text-align: right;">Page 176</p> <p>1 would not use Ethypharm technology or know-how</p> <p>2 to manufacture for Belmac's clients?</p> <p>3 A. We had our own know-how.</p> <p>4 Q. Do you recall saying that Belmac would not use</p> <p>5 Ethypharm technology and know-how in</p> <p>6 manufacturing omeprazole for Belmac's customers?</p> <p>7 A. It is clear understanding. Is implicit.</p> <p>8 Q. Do you recall saying that Belmac would not use</p> <p>9 Ethypharm machinery to manufacture omeprazole</p> <p>10 for Belmac's clients?</p> <p>11 A. Yes, that's how it was.</p> <p>12 Q. Did you call Mr. Murphy at any time during that</p> <p>13 meeting?</p> <p>14 A. No.</p> <p>15 Q. Did you make any calls to anyone during that</p> <p>16 meeting?</p> <p>17 A. No.</p> <p>18 Q. Did you contact Mr. Murphy after that meeting?</p> <p>19 A. Yes.</p> <p>20 Q. What did you tell him about that meeting?</p> <p>21 A. I suppose that I did call him maybe at one or</p> <p>22 two days afterwards, and I commented to him what</p> <p>23 took place, which is what I already stated here.</p> <p>24 Q. What was Mr. Murphy's response?</p>
<p style="text-align: right;">Page 175</p> <p>1 conversed that it was beneficial to arrive at an</p> <p>2 agreement for the good of both companies, and my</p> <p>3 response to them was, like, "Why not?"</p> <p>4 And when we went to get a taxi, Leduc</p> <p>5 said, "No, I'll get it for you." And when he</p> <p>6 said good-bye to us, he said, "Okay, so we are in</p> <p>7 agreement that we have to come up with an</p> <p>8 agreement." And that's all I remember.</p> <p>9 MR. BOSTWICK: The tape is going to</p> <p>10 run out, so we're going to pause.</p> <p>11 THE VIDEOGRAPHER: Thank you. The</p> <p>12 time is 3:29 p.m. on July 21st, 2006. This is</p> <p>13 the end of Tape Number 3, Volume 2 of the</p> <p>14 videotaped deposition of Mr. Adolfo Herrera.</p> <p>15 (Off the record)</p> <p>16 THE VIDEOGRAPHER: The time is</p> <p>17 3:34 p.m. on July 21st, 2006. This is Tape</p> <p>18 Number 4, Volume 2 of the videotaped deposition</p> <p>19 of Mr. Adolfo Herrera.</p> <p>20 Q. Mr. Herrera, we were just talking about a</p> <p>21 meeting in St. Cloud in February or March of</p> <p>22 2002. Do you recall?</p> <p>23 A. Yes, I remember.</p> <p>24 Q. Do you recall saying at that meeting that Belmac</p>	<p style="text-align: right;">Page 177</p> <p>1 A. You know, thank you very much for the</p> <p>2 information.</p> <p>3 Q. He had no reaction other than that?</p> <p>4 A. No. I explained to him the entire situation. I</p> <p>5 explained to him what had taken place, and he</p> <p>6 said, "Well, you know, very good."</p> <p>7 Q. Was an agreement reached after that to resolve</p> <p>8 the differences between the parties?</p> <p>9 A. Ethypharm asked us, Belmac Laboratories, to</p> <p>10 continue supplying with our product for their</p> <p>11 clients, and that's how we continue it for</p> <p>12 approximately one more year. Ethypharm was</p> <p>13 sending us the orders, the orders of goods, and</p> <p>14 we supplied them. You know, we got an agreement</p> <p>15 with the prices of supplying, and that's what we</p> <p>16 did.</p> <p>17 Q. Do you recall an incident where a judge and an</p> <p>18 expert went to the Zaragoza plant in around</p> <p>19 2003?</p> <p>20 A. Yes, mid-2003 or towards the end of 2003. I</p> <p>21 think it was towards the end of 2003 or</p> <p>22 beginnings of 2004, but, you know, somewhere</p> <p>23 around that period of time.</p> <p>24 Q. Were you at the Zaragoza plant at the time?</p>

28 (Pages 174 to 177)

<p style="text-align: right;">Page 178</p> <p>1 A. No.</p> <p>2 Q. You were in Madrid?</p> <p>3 A. Yes. I suppose that I was.</p> <p>4 Q. How did you learn of this incident?</p> <p>5 A. My manufacturing plant director communicated it</p> <p>6 to me.</p> <p>7 Q. Who was that?</p> <p>8 A. Antonio Cabodevilla.</p> <p>9 Q. What did Mr. Cabodevilla tell you?</p> <p>10 A. That the judicial secretary with one more person</p> <p>11 from Ethypharm and I think also with Adolfo de</p> <p>12 Basilio, but I really don't remember. What I</p> <p>13 remember is -- what I remember well, that it was</p> <p>14 judicial secretary with one more person from</p> <p>15 Ethypharm France.</p> <p>16 Q. And what happened?</p> <p>17 A. That they produce a document of every detail of</p> <p>18 their visit; what they observed, what they saw.</p> <p>19 Q. And did Mr. Cabodevilla tell you about that as</p> <p>20 it was happening or after it occurred?</p> <p>21 A. No, he called me to let me know that there was a</p> <p>22 visit from a judicial secretary with one person</p> <p>23 from Ethypharm France and they had to have this</p> <p>24 visit and they will be requesting documents or</p>	<p style="text-align: right;">Page 180</p> <p>1 A. That the judicial secretary with one person from</p> <p>2 France had visited the location and that they</p> <p>3 were putting together a document and requesting</p> <p>4 other documents.</p> <p>5 Q. Did you ever learn that the expert who was with</p> <p>6 the judge determined that the process that was</p> <p>7 being used at the time of the visit was the same</p> <p>8 process that was being used for the manufacture</p> <p>9 of omeprazole for Ethypharm?</p> <p>10 MR. STEWART: Objection. Goes to</p> <p>11 subjects which are reserved for Phase 2 of</p> <p>12 discovery. You may answer.</p> <p>13 A. No.</p> <p>14 MR. BOSTWICK: That's all I have.</p> <p>15 MR. STEWART: Just give me a couple</p> <p>16 minutes. Then I'll finish up.</p> <p>17 MR. BOSTWICK: Let's go off the</p> <p>18 record.</p> <p>19 THE VIDEOGRAPHER: The time is</p> <p>20 3:47 p.m. We're going off the record.</p> <p>21 (Off the record)</p> <p>22 (Recess)</p> <p>23 THE VIDEOGRAPHER: The time is</p> <p>24 3:55 p.m. We're back on the record.</p>
<p style="text-align: right;">Page 179</p> <p>1 whatever they needed to see.</p> <p>2 Q. What I'm trying to understand is whether</p> <p>3 Mr. Cabodevilla actually called you while this</p> <p>4 was taking place?</p> <p>5 A. He calls me at the moment that the judicial</p> <p>6 visit arrives.</p> <p>7 Q. Did you speak with Mr. Murphy?</p> <p>8 A. No.</p> <p>9 Q. Did you ever speak with Mr. Murphy about this</p> <p>10 incident?</p> <p>11 A. During this process, during the time this</p> <p>12 process was taking place, no, but afterwards.</p> <p>13 Q. What did you tell Mr. Murphy?</p> <p>14 MR. STEWART: I would instruct the</p> <p>15 witness not to reveal communications that were</p> <p>16 made in the presence of counsel.</p> <p>17 MR. BOSTWICK: That's fair.</p> <p>18 Q. Let me ask another question. When you spoke</p> <p>19 with Mr. Murphy about this event, was there a</p> <p>20 lawyer present either in Spain or in the U.S.?</p> <p>21 A. No.</p> <p>22 Q. Okay. Can you tell me what you discussed with</p> <p>23 Mr. -- what you said to Mr. Murphy about this</p> <p>24 event?</p>	<p style="text-align: right;">Page 181</p> <p>1 EXAMINATION BY MR. STEWART:</p> <p>2 Q. Good afternoon, Mr. Herrera.</p> <p>3 A. Good afternoon.</p> <p>4 Q. As you know, my name is Craig Stewart, and I'm</p> <p>5 counsel for Bentley Pharmaceuticals in this</p> <p>6 matter; and I have only a few questions to ask</p> <p>7 you.</p> <p>8 First, with respect to the meeting on</p> <p>9 February 21st of 2002 that you were providing</p> <p>10 your recollection of, when did that meeting</p> <p>11 begin?</p> <p>12 A. Approximately 9:30, 10 o'clock morning.</p> <p>13 Q. And approximately what time did you go to lunch</p> <p>14 with Mr. Leduc and the others?</p> <p>15 A. Approximately 1, 1:15 in the afternoon. As you</p> <p>16 know, France, they eat early.</p> <p>17 Q. Maybe early for Spain.</p> <p>18 A. That's true.</p> <p>19 Q. Do you happen to know the time difference</p> <p>20 between Paris, France and Exeter, New Hampshire</p> <p>21 or the east coast of the United States?</p> <p>22 A. The same difference as in Spain exists, six</p> <p>23 hours.</p> <p>24 Q. Now, at the time meeting on February 21st, would</p>

29 (Pages 178 to 181)

<p style="text-align: right;">Page 182</p> <p>1 you tell me again the people who were present on 2 behalf of Ethypharm as you understood it? 3 A. On my right, it was Gerard Leduc, Patrice 4 DeBregeas. In front of me, it was the American 5 attorney. Next to him, it was Roseline 6 Joannesse, and Fernando Cabodevilla was to my 7 left. That's how I remember it. 8 Q. And is it correct that the American attorney 9 explained what he understood to be the legal 10 situation with respect to who owned the 11 technology? 12 A. Yes. 13 Q. Did the American attorney, to your 14 understanding, say or suggest that Ethypharm 15 would bring a lawsuit in the United States? 16 A. He said that they could take that action. 17 Q. What did you respond, if anything? 18 A. I said to him that that was not my problem 19 because we were talking about relationships 20 among American -- excuse me, Spanish companies, 21 negotiations that were established within these 22 companies, and they were subject to Spanish 23 court system and laws, agreements that had been 24 signed between Belmac Laboratories and</p>	<p style="text-align: right;">Page 184</p> <p>1 recall that question? 2 A. Yes, I remember. 3 Q. And you responded, "Not in the United States, 4 but in Spain." Do you recall that? 5 A. Yes, I remember. 6 Q. And do you recall that you testified to 7 Mr. Bostwick that your depositions were in 8 connection with two cases, a patent infringement 9 action against Laboratorios Belmac by Merck and 10 one by Pfizer? Is that correct? 11 THE TRANSLATOR: And the second one, 12 by Pfizer? 13 MR. STEWART: By Pfizer. 14 A. Correct. 15 Q. And with respect to the infringement action by 16 Merck, can you tell us what the result was? 17 MR. BOSTWICK: Objection, relevance. 18 A. We won. 19 Q. And with respect to the action by Pfizer, what 20 was the result of that action? 21 MR. BOSTWICK: Same objection. 22 A. That we won. 23 Q. Turn, if you would, to Exhibit 12, please. 24 A. Yes, just give me a moment. I have to look for</p>
<p style="text-align: right;">Page 183</p> <p>1 Ethypharm. 2 Q. Now, you are not a member of the board of 3 directors of Bentley Pharmaceuticals; is that 4 correct? 5 THE TRANSLATOR: Ethypharm? 6 MR. STEWART: I'm sorry. Of Bentley 7 Pharmaceuticals, I thought I said. 8 A. No. 9 Q. Have you ever been a member of the board of 10 Bentley Pharmaceuticals? 11 A. No. 12 Q. What is your understanding of how your 13 compensation is determined, specifically your 14 salary? 15 A. My president of Belmac Laboratories, Jim Murphy, 16 by phone lets me know that he's going to submit 17 to the board of directors of Bentley 18 Pharmaceuticals my salary for the upcoming year 19 and it has to be approved by the compensation 20 committee of Bentley Pharmaceuticals and that as 21 soon as he receives a response, he will let me 22 know. 23 Q. Mr. Bostwick asked you yesterday whether you had 24 ever had your deposition taken before. Do you</p>	<p style="text-align: right;">Page 185</p> <p>1 it. 2 Q. It looks like this. There's an English 3 translation, I think, on the top. 4 In the letter from Adolfo de Basilio 5 to you, Mr. De Basilio said to you that Pierre 6 Germain understood that Mateo Gasca had been 7 dismissed and that Mr. Germain had asked Mr. De 8 Basilio to inquire for an official communication 9 of the facts of the dismissal in writing. Is 10 that your understanding of what Mr. De Basilio 11 was requesting in his letter to you of 12 December 5 -- I'm sorry, May 5 -- May 12th, 13 2000? 14 A. Yes. 15 Q. Did you ever speak to Mr. Germain directly 16 regarding the facts concerning Mr. Gasca's 17 dismissal? 18 A. No. 19 Q. Did you ever ask anyone why Mr. Germain was 20 interested? 21 A. No. 22 Q. And what were the reasons that Mr. -- that 23 Mr. Gasca was dismissed, to your understanding? 24 A. As I responded to the same question as by</p>

30 (Pages 182 to 185)

<p style="text-align: right;">Page 186</p> <p>1 Mr. Bostwick, they were the official reasons 2 that were considered for this dismissal, but 3 independent to those reasons, I had my own 4 personal reasons. 5 Q. What reasons were those? 6 A. I had information that he was working for 7 another pharmaceutical company. 8 Q. At the same time that he was working for 9 Laboratorios Belmac? 10 A. At the same time. 11 Q. Which company was that? 12 A. I don't remember the exact name of the company, 13 but it was a company related with pelletization. 14 MR. BOSTWICK: I'm sorry. With what? 15 THE TRANSLATOR: Pelletization. 16 A. Micropellets. 17 MR. BOSTWICK: Thank you. 18 Q. Did you ever confirm that that was the case? 19 A. Yes, it was true. 20 Q. Did you ever request Bentley to loan money to 21 Laboratorios Belmac for anything having to do 22 with its operations or acquisitions? 23 A. No. 24 Q. To your knowledge, has Bentley ever loaned</p>	<p style="text-align: right;">Page 188</p> <p>1 A. No. 2 Q. During the course of your employment as general 3 manager from June of 1999 to the present -- 4 THE TRANSLATOR: June 2000? 5 MR. STEWART: June of 1999. 6 THE TRANSLATOR: Sorry. 7 Q. -- have you negotiated and signed contracts with 8 companies other than Ethypharm? 9 A. Yes. 10 Q. Can you give me the approximate number? 11 A. 300, 350. I would say between 300 to 400 at 12 least. 13 Q. And of that number of contracts, how many of 14 those contracts have you requested permission 15 from Jim Murphy to negotiate and to sign? 16 MR. BOSTWICK: I'm going to object 17 because we don't know what those contracts 18 relate to in any way, and to the extent that 19 these questions call for a legal conclusion 20 regarding whether he has legal authority under 21 Spanish law, I'll object, but otherwise he can 22 answer. 23 Q. You may answer. 24 A. I have never requested permission from him.</p>
<p style="text-align: right;">Page 187</p> <p>1 money, cash to Belmac? 2 A. No. 3 Q. Now, in your capacity as general manager of 4 Laboratorios Belmac, you have the authority to 5 negotiate contracts, correct? 6 A. Yes. 7 Q. And to sign contracts on behalf of Belmac; is 8 that right? 9 A. Yes. That's true. 10 Q. And is it your testimony that you -- with 11 respect to Exhibits 10 and 11 -- 12 A. Yes. 13 Q. And these are the manufacturing agreement and 14 the purchasing agreement, dated March 23, 2000, 15 correct? 16 THE TRANSLATOR: Can I see them for a 17 second? 18 (Documents handed to the translator.) 19 A. Correct. 20 Q. Did you need permission from Jim Murphy to 21 negotiate and sign these contracts? 22 A. No. 23 Q. Did you ask him for permission to negotiate and 24 sign these contracts?</p>	<p style="text-align: right;">Page 189</p> <p>1 Q. At any time, did you tell Adolfo de Basilio that 2 you had authority to sign contracts on behalf of 3 Bentley Pharmaceuticals, Incorporated? 4 A. Never. 5 Q. At any time, did you tell any employee of 6 Ethypharm that you had such authority? 7 A. Never. 8 Q. At any time, did you ever tell Adolfo de Basilio 9 or any other employee of Ethypharm that you were 10 authorized to act on behalf of Bentley 11 Pharmaceuticals? 12 A. Never. 13 MR. STEWART: I have nothing further. 14 RE-EXAMINATION BY MR. BOSTWICK: 15 Q. When you had indicated that you had confirmed 16 that Mr. Gasca was working for another company 17 at the time he was working for Laboratorios 18 Belmac, how did you confirm that? 19 A. With a visitor's ID card -- 20 Q. Where did you -- 21 A. -- from Mateo Gasca. 22 Q. Where did you get that visitor's ID card? 23 A. Someone gave it to me. 24 Q. And you don't recall the company?</p>

31 (Pages 186 to 189)

<p style="text-align: right;">Page 190</p> <p>1 A. I know that it's a company to do with 2 micropellets. I don't remember the name. 3 Q. How long after you fired Mr. Gasca did you 4 confirm -- did you feel that you confirmed that? 5 A. You know, it was almost a very short period of 6 time, like approximately a week. 7 Q. After he was fired? 8 A. Yes. 9 MR. BOSTWICK: Thank you very much for 10 your efforts here today. 11 MR. STEWART: I join in the thanks for 12 your time and your patience. Thank you. 13 THE WITNESS: Thank you very much. 14 THE VIDEOGRAPHER: The time is 4:19 on 15 July 21st, 2006. This is the end of Tape Number 16 4, Volume 2 of the videotaped deposition of 17 Mr. Adolfo Herrera. 18 (Deposition concluded at 4:19 p.m.) 19 20 21 22 23 24</p>	<p style="text-align: right;">Page 192</p> <p style="text-align: center;">1 CERTIFICATE 2 3 COMMONWEALTH OF MASSACHUSETTS 4 SUFFOLK, SS 5 I, Sandra L. Bray, Registered Diplomate 6 Reporter and Notary Public in and for the 7 Commonwealth of Massachusetts, do hereby 8 certify: 9 That ADOLFO HERRERA, the witness whose 10 deposition is hereinbefore set forth, was duly 11 sworn by me and that such deposition is a true 12 record of my stenotype notes taken in the 13 foregoing matter, to the best of my knowledge, 14 skill and ability. 15 IN WITNESS WHEREOF, I have hereunto set 16 my hand this 4th day of August, 2006. 17 18 19 Sandra L. Bray, RDR 20 Registered Diplomate Reporter 21 22 23 24</p>
<p style="text-align: right;">Page 191</p> <p style="text-align: center;">1 CERTIFICATE 2 I, ADOLFO HERRERA, do hereby certify that I 3 have read the foregoing transcript of my 4 testimony, given on July 20, 2006, and I further 5 certify that said transcript is a true and 6 accurate record of said testimony (with the 7 exception of the corrections listed below): 8 Page Line Correction 9 10 11 12 13 14 15 16 17 Dated at , this 18 day of , 2006. 19 20 ADOLFO HERRERA 21 22 SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY 23 24 slb</p>	

32 (Pages 190 to 192)

A	133:12,17	159:10 160:8	answer 86:2	183:19
ab 167:15	135:20 136:2	160:15 167:9	89:5 90:1,2,3	approximate
ability 102:22	137:16,22	167:22 168:4	91:17 92:13	188:10
192:14	174:5 175:14	168:6,9 173:6	92:18 93:10	approximately
able 119:13,15	175:19	173:9 174:9	93:11 94:17	98:24 109:11
126:16	178:11 185:4	174:10 175:2	95:19 115:22	139:14
absent 170:8	189:1,8	175:7,8 177:7	116:1 122:17	162:20,21
absorption	190:17 191:2	177:14	134:1 135:6	170:12
167:16,17,18	191:19 192:9	187:13,14	157:22	177:12
acceptable	advertisement	agreements	159:22	181:12,13,15
80:22,24	112:15,16	81:24 83:10	162:10,11	190:6
95:10 173:15	advice 95:22	85:12 88:14	165:8 171:9	April 75:24
173:23	124:24	89:8 90:10	172:2 173:19	77:10,22 78:1
accurate 84:15	affirmed 74:15	121:1 143:6	180:12	78:6,12 80:1
191:6	afternoon	156:14,15	188:22,23	94:6 96:5
acidulously	181:2,3,15	160:2,6	answered	112:19 113:7
85:2	agency 82:7,9	182:23	89:21 164:13	114:10,18,23
acquired	91:20,24	ahead 121:21	170:21	145:10
135:16	agent 92:5	147:5	answering	146:23
acquisitions	ago 113:4	ahh 146:13	88:23	area 82:15 89:6
186:22	126:7 146:20	172:17,17	Antonio 111:5	89:18 130:23
act 189:10	agree 143:14	alleged 84:23	131:22 162:8	areas 84:2
acted 74:12	149:9,12,17	89:19	162:22 178:8	129:16 130:6
acting 87:15	agreed 89:22	Alsina 76:8,12	anybody	argumentative
92:5	122:16	Alsincia 76:12	122:19 124:6	89:16 91:18
action 99:24	agreement	Alvarez 73:3	142:23	92:2 151:17
99:24 182:16	72:12 73:7	123:2,4	anyway 159:16	arrangement
184:9,15,19	77:10,12,14	136:18 162:6	appear 156:15	91:10 93:4
184:20	77:20,24	162:21	APPEARAN...	140:6 141:3
Acuerdo 72:8	78:11,15,17	American	70:1	arrival 99:1
72:10	78:18 79:7,9	150:20	apple 76:10,11	arrive 101:1,17
acuoso 150:6	79:12,18	151:10,23	applicable	175:1
150:15	83:19,21,24	170:1,17	69:15	arrived 100:10
addition	86:24 88:7	173:15,22	applying 87:11	123:23
103:17	94:5,8 100:23	174:12,12	appointed	arrives 179:6
147:17	101:2,18,21	182:4,8,13,20	118:2	article 83:12
addressed	101:21,22	analytical	appreciated	87:6,7,19
165:19	102:1 103:4	79:16 174:8	140:14	112:9 127:4
Adolfo 69:13	117:8 121:22	analyze 145:21	appreciation	127:24
72:3 74:5,14	127:7,16,19	146:3,17,24	140:17	168:12
78:24 80:6	127:22,23	147:1	approaching	articles 113:10
97:11 98:12	141:23 144:5	analyzing	166:18	117:9
103:10 104:2	144:9 145:15	100:23	appropriate	Asencio 111:5
105:23 106:4	152:21 153:4	Angell 69:20	115:15	asked 76:3
120:18 121:2	153:7,19	70:11	153:14	94:2 121:12
122:1,24	154:12	announced	approval	121:16
123:15	156:11,21	154:14	137:12	161:18
125:18	158:11	155:10	approved	164:13

Page 194

170:18 171:2 173:19 177:9 183:23 185:7 asking 75:3,5 83:24 89:16 107:4 109:19 171:19 aspirin 97:1 120:21 121:17 assign 107:23 assigned 108:20,21 129:13 130:19 assignment 107:20 167:9 167:10 assist 163:3 assisted 170:7 assumes 85:24 assuming 125:11 AstraZeneca 148:23 AstraZeneca's 148:14,17 attached 78:20 83:19 attaches 141:23 Attachment 73:13 165:3 attend 168:1 attendance 170:3 attended 75:22 97:9 169:22 170:7 attention 112:2 attorney 170:1 170:17 171:7 173:15,22 174:12,13 182:5,8,13 attorneys 171:5 August 192:16	authority 130:7 130:9,16 133:20 187:4 188:20 189:2 189:6 authorization 135:8,17 137:17,23 authorized 189:10 available 108:6 Avenue 69:21 70:12 aware 81:20,22 81:22 89:7 90:15,23 104:13 130:12 163:24 Azpetia 94:15 112:3 114:20 115:2,3 a.m 69:23 74:3 75:14,17 82:24 83:8 105:21 106:2 B B 72:6 73:1 111:5 BAACH 70:3 back 75:17 83:8 92:12,16 93:14 98:10 106:5 113:14 118:18 130:22 133:18 135:21 139:4 139:7 155:21 162:10,11 163:5,12 180:24 based 77:17 93:2 Basilio 72:23 78:24 79:5 80:6 83:24	97:12 98:12 103:11,19 104:2,5,16 120:18 121:2 122:1,3,20,24 123:11,15 125:18 128:16 135:20 136:3 136:6,13 137:16,23 174:5 178:12 185:4,5,8,10 189:1,8 Bates 83:3 began 170:15 beginnings 177:22 begun 98:16 behalf 69:14 182:2 187:7 189:2,10 behavior 143:24 146:22 believe 85:11 96:2 106:7 146:19 149:21 155:15 157:12,13 171:21 believed 143:16,22 Belmac 70:16 77:5,21,23 81:12,16,24 83:4 85:18 87:11 88:14 89:9 90:9,11 90:16,16 91:3 91:8,13 92:4 92:19,22 93:2 93:5 97:10 100:6,23 101:8,23 102:3,4,11 105:13	107:11,13,16 107:23 108:17,23 109:6,13 110:8 111:13 111:18 114:19 117:23 118:3 120:6,9 124:16 125:21 127:6 127:24 128:2 129:3,7,12 130:11,21 131:4 133:21 134:4,13,24 135:5 137:21 138:2,4,6,16 138:22 140:5 140:9,22 141:3,24 142:10,15 145:14 146:6 150:18,22 151:12,20 155:11 156:17,23 158:21 159:12 160:12 161:17 163:1 163:15,21 164:3,7,8,18 166:7,17 167:12,23,24 168:8,22,24 169:23 172:6 173:13 174:3 175:24 176:4 176:8 177:9 182:24 183:15 184:9 186:9,21 187:1,4,7 189:18 Belmac's 89:7 94:22 153:3 176:2,6,10	beneficial 175:1 benefits 140:11 Bentley 69:8 72:13 77:21 91:13,22 92:5 92:21 93:3,4 93:8,12 105:6 106:9,14,20 107:1,11,14 108:11,13,19 109:2 110:7 111:16 113:8 134:17,20 137:12,24 138:6,8 140:5 140:8 141:21 146:15 149:22 150:21 151:7 151:14,21 154:13,24 155:8 163:14 163:24 164:7 164:8 165:19 165:22,24 166:2 167:12 167:22 168:9 168:22,24 181:5 183:3,6 183:10,17,20 186:20,24 189:3,10 Bentley's 106:21 138:13,15,18 138:22 Berenguer 94:20 95:1 124:20 169:23 172:13,15,18 174:21 best 126:11 144:17,18 158:21 192:13
--	--	--	---	--

better 132:17 133:2 beyond 82:12 bilingual 118:13 bit 108:15 board 72:13 106:9,14,21 107:1 108:18 108:21 130:20 134:15,17 151:14 165:20,22 183:2,9,17 book 121:8 boss 134:3,6 134:22 bosses 100:13 100:14 102:23 104:7 105:14 131:12,14 Boston 69:22 70:13 Bostwick 70:7 72:4 74:19 75:8,12 82:4 82:14,20 83:2 84:1,3,6,12 84:16 85:6 86:22 87:5 89:3 91:21 92:6,11 102:14 105:18 106:17 109:22 113:13 118:21 132:23 134:1 136:23 139:3 139:19 141:6 148:17 153:24 158:24 159:21 161:14 162:9	163:6 175:9 179:17 180:14,17 183:23 184:7 184:17,21 186:1,14,17 188:16 189:14 190:9 Bostwick's 83:18 bottom 145:12 bounds 90:4 Bray 69:17 192:5,18 break 105:17 105:19 132:21,22 133:1 154:5 155:16 briefly 114:2 bring 182:15 British 118:14 brother 129:22 brought 171:3 business 100:19,21 105:1 140:6 149:15,15 164:19 <hr/> C C 74:1 111:6 128:6 191:1,1 Cabodevilla 111:6 131:23 162:8,22 178:8,9,19 179:3 182:6 call 112:8 121:2 176:12 176:21 188:19 called 69:14 83:20 112:11 121:8 178:21 179:3 calls 151:17 176:15 179:5	cancellation 171:13,16,18 capacity 187:3 card 189:19,22 care 130:16 Cargos 121:10 Carlos 111:5,6 Carmen 111:7 Carta 72:21 119:21 case 69:7 148:12 150:11 159:14 186:18 cases 184:8 cash 187:1 CEO 134:16 certain 122:12 136:3 CERTIFICATE 192:1 certification 81:14 certify 191:2,5 192:8 Cesion 73:15 167:1 chairman 134:16 151:14 change 96:11 changed 127:9 127:15 128:12 162:18 characterizat... 85:22 charge 161:9 161:22 162:24 chart 137:11 137:13,18,24 charts 121:8 circle 76:5 circumstances 121:20 Civil 69:16	claim 160:13 clarification 78:10 88:8 clarified 116:22 120:10 142:16 clarity 146:20 classic 84:6 clear 83:14 88:12 108:16 117:7,7 134:3 176:7 clearly 81:24 82:1 85:18 87:24 100:12 101:14 103:10 Clemente 94:15 95:1 113:22 124:21 client 76:18 93:17,21,23 162:7,16,24 clients 100:24 101:18,22 102:4,7 127:7 152:14,15,18 153:5,15 154:13 158:14 160:19 161:10,19,20 161:23,24 162:1,20 163:16,20 164:21 166:18 172:23 176:2 176:10 177:11 close 89:5 101:2,16 133:2 closely 132:9 closing 119:6 Cloud 169:20	175:21 Clua 111:6 coast 181:21 coincidence 153:18 154:9 154:16 collaboration 100:3 collaborations 99:9 colloquy 159:22 come 88:11 103:20 126:24 127:3 130:22 131:2 138:16,19,22 153:15 160:14 163:20 164:22 175:7 comes 75:3 89:3 98:19 127:2 coming 127:1 commencing 69:23 comment 95:21 102:24 115:11,21 116:12,19 137:19 140:17,20 145:10 149:14 commented 100:12 102:21 105:4 132:12 176:22 commenting 100:18 142:6 comments 95:17,22 commercial 101:21,22 122:10 141:2 155:9 161:21
--	--	---	---	--

Page 196

161:22 168:1 168:2 Commercially 140:10 commission 102:8,10 commitment 147:21 committee 108:13 129:18 183:20 Commonwe... 69:19 74:7 192:3,7 communicate 108:1 109:2 164:17 communicat... 81:12 135:14 146:2 167:24 178:5 communicates 108:17,23 communicati... 150:17 151:9 151:11,19,22 166:17 communicati... 185:8 communicati... 164:20 179:15 companies 90:21 93:2 99:2 100:4,5 100:19 112:8 116:21 117:6 117:9 120:11 121:4 122:13 124:2,12 148:9 172:10 175:2 182:20 182:22 188:8 company 76:13,14 86:5 93:13 98:19 98:21 101:16	107:20 111:2 112:9 118:11 123:11 129:23,24 130:6,6 131:24 132:1 132:19 135:14 138:10 144:17 155:9 172:8,11 186:7,11,12 186:13 189:16,24 190:1 company's 137:11 compared 122:8 compensation 108:13 183:13,19 complaint 113:6 complete 129:18 completed 80:2 completely 88:22 completing 132:13 complicated 102:23 Compra 72:21 119:22 compromise 120:8 128:13 compromised 79:13 compromising 120:7 Compromiso 72:21 119:21 Concepcion 111:8 concept 122:14 151:3	concerning 185:16 Concha 111:10 concluded 144:15 158:17 190:18 conclusion 188:19 conduct 87:1 confidentiality 73:7 79:12,15 79:19 80:16 81:23 83:10 83:13 144:5 152:21 153:7 153:19 154:12 156:10,14,15 174:9 confirm 186:18 189:18 190:4 confirmed 189:15 190:4 conflicts 132:18 conjunction 120:20 connection 159:14,15 184:8 conscious 147:2 consejero 134:9,11 consequence 131:12 153:16 163:21 consider 134:7 142:22 169:14 consideration 160:15 considered 84:3 186:2 consistent 138:11	166:12,13,14 166:16 consolidated 93:13 consult 145:5 consulted 135:15 145:3 contact 98:15 176:18 content 99:6 context 114:15 114:16 continuance 173:10 continue 88:24 99:8 100:17 135:11 144:19 147:4 152:13 160:19 172:4 177:10,11 continued 69:13 73:1 74:4,19 160:20 continues 129:23 continuing 143:11,17 152:10 contract 78:7 79:20 80:10 80:15,21 95:10 99:6,8 117:4,4,5 120:5,13 121:7,11,18 121:19,23 122:14,14 123:16 125:22,22 127:5 142:21 144:13,19 150:11 152:11 153:9 153:11 167:8 171:14 173:11,13	contracts 80:20 81:18 94:18,24,24 95:23 96:21 96:24 98:24 99:3,5 120:21 121:13 122:17 123:7 123:9,12 124:13 125:1 135:12,12 141:4 142:12 142:17 143:11,16 152:12 160:18 163:16 164:9 187:5,7,21,24 188:7,13,14 188:17 189:2 contract's 169:16 Contrato 72:19 73:14 119:18 166:24 control 131:9 convenient 147:3 conversation 95:8 102:24 113:24 115:1 115:9 125:20 126:5 142:3,5 142:18,20,24 143:7 144:24 145:7 conversations 95:12 125:12 125:13 converse 164:4 conversed 123:10 175:1 conversing 121:6 copy 73:12 113:18 137:11,18
---	--	--	--	---

165:2 corner 104:11 174:23 CORRAL 70:21 correct 76:1 77:3,5,6 78:3 78:12 86:14 86:15,18 87:13,16 88:2 88:5,6,17 89:11 90:14 91:9,15 95:2 95:14,15 96:7 101:5,6,9,10 101:11 103:14 105:10,11 106:23 109:18 111:14,15,19 114:20,23 117:21,22 118:3,4,6 127:18 128:4 128:8,9 133:21 134:4 134:9,14,17 134:18 135:1 135:4 136:13 139:17 140:1 140:14,18 142:1,1,2 146:8,9 147:23,24 148:2,4,10,11 148:14,18,22 148:23,24 149:6,23 150:7,8,22 151:5,6 152:1 152:2,5,7,8 152:16,19 153:9,10,12 153:13 156:24 157:1 157:2,8,9,19 158:6,7,12,15 158:16	164:14,15 165:14 167:18,19 168:16,22,23 182:8 183:4 184:10,14 187:5,15,19 corrected 139:22 Correction 191:8 corrections 128:3 191:7 correctly 96:11 correspondent 79:12,17 corresponding 131:16 cost 149:3 costs 147:18 counsel 86:20 125:12,13 179:16 181:5 count 109:16 109:20 counting 109:21 couple 180:15 course 101:13 103:18 137:5 165:7 188:2 court 69:1 173:19 182:23 courts 124:14 co-workers 132:16 Craig 70:14 181:4 CSR 69:18 Cubas 70:19 current 135:13 currently 128:1 168:15 customer 93:17,21 161:16 customers	164:10 166:6 176:6 <hr/> D D 70:8 72:1 74:1 128:7,8 128:9 daily 149:16 data 139:11 140:2 date 96:20 107:2 126:1 141:5 145:24 152:10 154:10 169:16 dated 72:12,15 72:17,18,23 73:3,5,6,10 73:13,17 112:19 114:10 117:15 128:17 136:19 141:8 147:14 156:1 165:3 187:14 191:17 dates 145:8 David 128:7 day 121:2 147:11 153:2 153:19 191:18 192:16 days 98:24 176:22 day-to-day 130:15,17 de 70:19 72:8 72:10,19,21 72:21,23 73:14,15,15 78:24 79:5 80:6 83:24 97:12 98:12 103:11,19 104:2,4,16	119:18,21,21 120:18 121:2 122:1,20,24 123:11,15 125:18 128:16 135:20 136:3 136:6,13 137:16,23 166:24 167:1 167:1 174:5 178:11 185:4 185:5,7,10 189:1,8 dealing 161:9 Dear 137:9 DeBregeas 72:16 100:16 100:17 102:18 113:8 114:9 117:11 118:21 169:8 169:14 170:1 170:3,8,20,21 174:20 182:4 December 128:17 156:1 185:12 decide 172:20 decided 135:11 143:5 172:22,24 decides 108:14 134:14 decision 135:15 143:10,13 144:18,22 145:22,24 167:21 decisions 135:4 149:11 149:12,17 Defendant 69:10 70:10 defined 79:18 107:21 117:1 117:2	definition 81:11 DELAWARE 69:2 delegado 134:9,11 delegate 134:13 delegated 130:18,20 delivered 155:13 delivery 105:5 105:7,8 155:8 Deluc 98:6 100:14 department 161:8,22 depended 107:17 depends 107:15,17 deposition 69:13 74:5 105:23 106:3 106:16,18 133:12,16 175:14,18 183:24 190:16,18 192:10,11 depositions 87:1 184:7 describe 159:1 DESCRIPTION 72:7 73:2 designed 150:17 detail 178:17 details 82:11 85:4 determined 145:14 180:6 183:13 develop 110:10 developing 149:7 development
--	---	--	---	---

Page 198

129:16,18 131:9 148:6 150:4,24 151:1 Diarios 112:7 112:10 difference 181:19,22 differences 177:8 different 88:22 90:1 97:22 110:21 121:5 121:19,20 122:2,4,7,15 122:16 difficult 129:19 132:15 dinner 97:5 Diplomate 69:18 192:5 192:19 direct 122:23 124:11 directed 100:21 directly 110:1 115:5 124:18 125:18 185:15 director 81:21 86:7,11 87:16 94:15 132:6,7 132:8 161:21 162:7 178:5 directors 72:13 90:21 96:12 106:10,14 108:18,22 130:21 131:15,16 134:15 165:20,23 183:3,17 disagree 149:13 discovery 82:6 82:13 89:20	90:5 92:9 180:12 discuss 115:7 118:15 123:3 123:12 135:22 147:16 172:19 discussed 83:12 98:13 105:3,13 107:7 123:10 145:16 149:5 179:22 discussing 75:24 79:4 80:5 114:5 150:9 160:2 discussion 80:2 84:1 98:18 107:8 115:9 119:5 126:1,19 133:7 143:2 163:10 discussions 78:5,13,21 79:2 80:8,19 94:10 104:15 124:21 125:4 125:8 dismissal 185:9,17 186:2 dismissed 129:3,21 185:7,23 distinctions 88:9 distribute 108:24 distribution 108:7 156:22 DISTRICT 69:1 69:2 divorce 82:7 document 72:8 72:10,11,19	72:21 73:14 78:3 81:10 86:3,10,22 87:15 88:4 89:22 106:7 107:5 110:2 112:17,22 117:14,18 119:18,21 127:2 128:15 128:19,22 129:1 136:17 137:4 141:11 141:15,16,19 143:1,1 147:12,16 152:20,23 154:7 155:22 156:4,7,13,16 157:3,10,16 157:19 158:8 159:9,11,17 160:17 161:2 163:13 165:1 165:6,12 166:22,24 167:7 169:6 169:11 174:3 174:12,13,15 178:17 180:3 documents 72:22 81:16 85:18 87:2 89:13,18 90:17,20,23 119:16,22,24 120:4,12,15 120:17 125:17 126:4 126:22 178:24 180:4 187:18 Dodge 69:21 70:11 doing 89:15 136:10 137:6 dozens 89:8 91:2	Dr 169:23 draft 79:6 94:4 94:10,12,18 94:24 95:17 127:20 141:23 142:4 drafts 78:19,19 78:22 79:4 80:4,5 94:13 95:23 drug 105:5,7,8 155:8 due 91:6 duly 74:9,14 192:10 duration 127:16 duties 138:9 DWIGHT 70:7 D.C 70:6 E E 70:14 72:1,6 73:1 74:1,1 96:18 111:5 127:4 128:7,8 128:9 191:1,1 early 163:17 164:1,23 181:16,17 east 181:21 eat 98:5 174:22 174:22 181:16 Edward 128:7 Edwards 69:20 70:11 effort 149:10 149:18 efforts 190:10 either 92:13 94:13 132:3 161:8 179:20 eleven 111:24 eliminate 101:17 Eloi 123:1 emphasize	92:24 employee 189:5,9 employees 91:3 107:13 107:23 108:6 108:8 109:1,6 110:8 111:13 employment 188:2 Enalapril 156:11 enclosed 137:10 Enclosure 73:10 156:1 English 74:9 74:11 86:21 86:23 87:3,18 87:22 112:22 118:5 119:7,9 119:14 121:10 136:24 137:7 156:4 157:19 159:1,2 165:7 185:2 Enhancers 167:15 enter 167:21 entering 168:3 entire 170:4,7 177:4 Escalera 71:2 74:6 ESQUIRE 70:7 70:8,14,21 establish 159:24 established 159:15 182:21 Ester 111:2 estimate 126:11 Ethypharm 69:4,5 75:23 76:22 77:7,11
---	--	---	---	--

78:14,15,21	176:9 177:9	78:20 79:4	180:5	112:18
81:11,18 82:2	177:12	80:4,20 83:13	expiration	128:16
85:20 86:8,13	178:11,15,23	83:19 85:17	152:10	136:18 141:8
87:12 88:2,16	180:9 182:2	86:3,9,10	explain 101:12	141:20
90:22 91:2,7	182:14 183:1	87:18 90:17	108:15	147:13
91:14 92:20	183:5 188:8	90:18,18	116:19	149:21
92:21 93:1,5	189:6,9	93:14,19 94:2	140:19 146:6	February 157:6
93:16,20,22	Ethypharm's	94:3,4,5,11	156:17	157:7,13
93:23 95:23	76:18 85:13	94:13,19,24	171:11,12,20	175:21 181:9
96:3,12 97:8	86:17 88:20	106:8,11	explained	181:24
97:11,20	89:11 91:11	112:20 114:8	101:13	Federal 69:16
98:17 100:6	93:17 153:5	114:11 115:2	125:21	fee 169:4
100:21,22	154:13	117:16	143:15	feel 190:4
101:2,4,9,15	173:14,17	119:19,23	146:19	felt 174:15
102:3,10	Europe 155:9	120:14	171:13 173:5	Fernando
103:10,12	euros 168:14	124:17,17	177:4,5 182:9	124:19
104:9 112:12	event 179:19	128:4,10,18	explaining	169:23
112:14	179:24	136:20 141:7	172:1	172:13,14,18
115:13	evidence 85:24	141:9 145:11	exploration	174:21 182:6
116:14 119:6	exact 145:8	147:14	168:1	fifteen 98:24
120:6,9,17,18	149:2 154:10	149:20,20	express	154:6
122:13,20	186:12	152:22 154:1	116:10	file 147:17,19
123:1 124:6	exactly 79:6	154:2,22	extent 164:12	filing 154:14
124:22 125:2	97:5 101:24	155:4 156:2	188:18	final 144:22
135:10,18	102:5 106:18	156:18	E-mail 73:12	145:24
136:5 137:14	109:5 141:18	157:17 158:3	165:2	finance 93:12
138:5 139:2	149:4	163:13 165:4		financial 101:2
140:4,20	examination	165:15 167:2	F	find 81:8 82:21
141:1,24	74:19 82:10	169:9 184:23	F 70:4 76:17	83:21 172:22
142:9,11,16	181:1	exhibits 83:5	191:1	FINE 70:8
142:23 143:6	example 81:6	85:17 90:24	Fabricacion	finish 144:21
143:22 144:7	102:6 108:2	122:21 123:5	72:20 119:18	180:16
145:16	111:2 144:12	124:3,7 125:5	fact 115:7	fire 131:1
146:21	exceeding	125:10	135:20	135:4
148:23	90:4	187:11	137:22	fired 129:11
150:11 152:1	exceeds 92:9	existence	facts 85:24	130:1,3 131:3
152:4,11,12	exception	107:19	92:3 185:9,16	131:18
153:3,9	191:7	exists 181:22	fair 87:5 140:4	132:11 190:3
154:11	exclusive	exited 174:16	160:1 179:17	190:7
158:15	125:12	expands 89:13	fall 78:14	first 74:8 83:16
160:19	exclusively	expensive	falls 131:10	86:3 107:2
163:16,20,23	122:13	148:1	familiar 104:13	137:3,8 155:7
164:10,21	excuse 101:20	experienced	174:14	159:21
166:6,18,21	118:22	163:22	family 104:20	160:17
169:21,24	171:17 174:6	experiencing	far 81:20 111:9	165:11 181:8
172:1,24	182:20	153:17	130:12	Fitzgibbons
173:13,20,24	Exeter 181:20	166:20	fax 72:15,23	73:13 165:2
174:4 176:1,5	exhibit 76:2	expert 177:18	73:3,4,6,16	five 132:24

Page 200

174:19 focussed 123:15 follow 130:22 following 78:6 78:22 follows 74:17 force 148:20 148:21 foregoing 191:3 192:13 forget 75:6 form 77:13,18 86:1 formalize 121:3 formalized 98:23 99:1,7 formulation 147:9 formulations 80:14 144:10 149:8 155:13 forth 103:3 192:10 foundation 84:21 159:10 159:24 four 111:23 152:5 153:11 154:14 155:12 France 69:4 96:12 98:11 98:17 101:5 104:10,13 143:22 178:15,23 180:2 181:16 181:20 frankly 92:14 free 90:5 French 119:7 121:8,9,11,12 Friday 69:22 friend 170:22 171:3 friends 171:4	front 81:13 85:16 139:11 140:3 182:4 functions 129:19 132:13,14 further 78:5 189:13 191:4 G G 74:1 96:18 127:12,13,15 127:24 128:6 128:7,8,9 Gadry 73:9 155:24 gain 136:15 gaining 135:24 136:4 Galisteo 111:7 ganancias 139:17,18,22 GARCIA-PAL... 70:22 Gasca 129:2,5 129:11 130:1 131:1,11,17 132:10 185:6 185:23 189:16,21 190:3 Gasca's 130:23 185:16 gathered 138:7 general 81:21 86:6,11 87:16 88:5 89:7 90:8,15,20 91:4 93:7 94:14 96:12 96:13,14 98:17 102:23 107:15,22 109:10 111:17 113:20 114:16,18,19	114:22 117:20 118:2 120:18 123:24 124:12 130:2 130:4 131:4 133:21 134:24 159:6 160:16 187:3 188:2 generally 109:6,12 156:6 160:10 generate 132:18 gentleman 170:19 gentlemen 132:4,10 George 128:7 Gerard 97:15 98:6 100:14 141:20 169:24 170:19 174:20 182:3 Germain 96:15 96:16,17 97:11 98:4,12 98:16 100:11 101:7,13 102:17,21 103:3,7,17 104:3 118:19 118:24 123:24 124:3 185:6,7,15,19 getting 82:4,10 84:22 159:22 give 137:18,24 168:24 173:18 180:15 184:24 188:10 given 86:20,21 111:16 168:21 191:4	global 77:12 77:19 go 75:12 82:21 83:20 88:24 98:10 116:13 121:21 123:11 132:24 133:4 163:6 170:4 174:22 180:17 181:13 Goes 180:10 going 82:12,14 82:19,20,24 84:20 85:3 88:7,8 90:2 97:20,20 99:20 103:7 106:7 108:15 110:1 116:23 121:23 128:15 133:6 136:22,23 137:6 138:10 140:8,9 144:2 154:4 155:18 159:7 163:5,9 164:3 175:9 175:10 180:20 183:16 188:16 Gonzalez 94:15,17 95:1 112:3 113:22 114:1,20 115:2,3,14,15 115:19 116:1 116:10,12,15 123:2,4 124:21 good 74:20 75:18,19 80:3 99:10,11 105:16,18 119:13 121:2 175:2 177:6	181:2,3 goods 177:13 good-by 175:6 Government 138:9 GREGORIO 70:21 grounds 90:3 92:6,8 group 103:21 103:22 H H 72:6 73:1 half 91:19 139:24 170:13 Hampshire 181:20 hand 192:16 handed 187:18 happen 99:20 181:19 happened 171:1 173:4 174:18 178:16 happening 143:24 178:20 happens 147:11 hard 145:8 harmless 158:22 heard 159:13 help 91:7 122:6 156:5 157:21 165:7 169:2 hereinbefore 192:10 hereunto 192:15 Hernandez 111:8,21 Herrera 69:14 72:3,18,23 73:3,6,10,16
---	---	---	---	--

74:5,14 75:18	114:12	100:3	insist 125:24	115:11
82:16,18 83:9	117:17	indemnify	instruct 89:4	116:20
83:20,21 84:2	119:20,23	158:22,24	90:2 91:16	117:12
84:4,11 85:11	128:18	160:12	92:13 179:14	135:22 144:9
105:23 106:4	136:20	independent	intention 152:3	145:5
117:15	141:10	129:14 186:3	153:3 171:8	issues 82:7
128:16	147:15	Independently	intentions	91:6 94:8
133:12,17,18	152:22 154:3	132:17	99:10 100:13	103:5 105:13
133:19	156:3 157:18	India 76:11	152:9	114:5 116:14
136:18 137:4	165:5 167:3	indicate 89:9	interest 168:2	164:4
141:12	169:9	indicated 77:9	interested	Ivelissa 71:2
147:13,16	identify 158:23	85:13 152:9	185:20	74:6
153:1 154:7,9	Ignacio 111:7	189:15	interesting	J
155:22,24	123:2 137:9	indicates	150:19	Jan 161:3
156:4 159:3	162:6,21	87:24 152:3	151:10,13	January
163:14 165:6	Ilhem 73:9	158:10,17	interests	158:18 165:3
169:7 175:14	155:24	indicating	144:17	165:17
175:19,20	imagine	88:15	interpret	166:10
181:2 190:17	104:12	indication 87:9	134:20	Jim 97:10 98:3
191:2,19	113:20	individual 76:4	153:21	98:11 100:10
192:9	130:13	individuals	interview	101:4,13
Herrera's	131:21 164:4	88:13	112:11	104:2 108:16
85:22	implicit 176:7	Indometicin	117:10	108:23 115:6
hi 103:12	importance	97:1 120:22	interviews	134:3,8,16
hold 158:22	138:5	industrial	112:4,13	141:16
holding 134:12	important	132:6,7	introduce	183:15
holds 134:8,8	104:20,22	inform 164:20	98:20 127:4	187:20
honestly 95:13	134:23	information	introduced	188:15
114:7 143:9	135:13 145:4	80:13 124:24	127:3,7,14,21	Joannesse
158:4	146:3,18	135:9,18	127:24	72:15 112:18
hour 91:19	improved	142:23 143:3	introducing	170:2 174:14
hours 170:13	155:13	153:16 177:2	170:15,16	174:15 182:6
170:13	incident	186:6	invitation	job 132:18
181:23	177:17 178:4	informed 149:7	169:14	134:19
Huntington	179:10	164:2	invited 84:1	join 190:11
69:21 70:12	included 91:21	informing	104:7 170:23	JONATHAN
I	102:2	136:9	170:24	70:8
IBERFORO	inconsistent	infringement	inviting 171:2	Jose 111:6
70:17	166:15	171:15,18	involve 151:7	131:22,24
ID 189:19,22	Incorporated	184:8,15	involves	Juan 111:5
idea 101:7	189:3	infringing	150:21	judge 84:19
102:2 103:2	incorrect	148:9,13,15	involving	177:17 180:6
131:1 151:13	140:15	infringio	172:5	judgment
168:4	increase	171:20	Irizabel 111:3	123:20,22,23
identification	167:16	ingresos	118:13	judicial 178:10
83:6 106:12	increased	139:23	issue 82:8 83:9	178:14,22
112:21	167:15	inquire 85:2	83:17 84:5	179:5 180:1
	incrementing	185:8	90:6 102:19	

July 69:22 74:3 105:21 106:2 106:10 107:3 133:10,15 175:12,17 190:15 191:4 junction 88:11 June 117:15 118:1 141:9 141:17 143:5 147:14 150:7 150:15 188:3 188:4,5	168:7 170:16 170:17,18 171:10 172:5 177:1,6,14,22 178:21 181:4 181:16,19 183:16,22 188:17 190:1 190:5 knowing 90:10 knowledge 186:24 192:13 know-how 80:17 81:2,11 81:15 82:1 83:11 85:13 85:15 88:3,10 88:21 94:9 116:18 144:6 167:9,10 171:24 173:16,17,20 173:23 174:2 174:3 176:1,3 176:5 Kristin 71:3	89:9 90:9,11 90:16 91:3,8 91:13 92:4 93:1,5 101:8 101:23 102:2 102:11 105:13 107:10,13,22 108:23 109:6 109:13 110:8 111:13 114:19 117:23 118:2 120:6,9 124:15 129:3 129:7,12 130:21 134:4 134:13,24 138:2,4,6,16 138:22 140:5 141:3,24 142:10,15 146:5 150:18 150:22 151:12,20 153:2 155:11 156:23 161:17 163:1 164:7,18 166:7 167:23 168:8 184:9 186:9,21 187:4 189:17 labs 77:23 91:12 97:11 language 74:10,10,11 74:11 87:3 119:16 121:12 158:20 lansoprazole 147:6 150:5 150:14 154:15 Larry 76:10 lasted 170:12 late 163:17	164:1,23 law 124:14 188:21 laws 182:23 lawsuit 182:15 lawyer 89:4 123:12 179:20 learn 178:4 180:5 leave 172:21 Leciva 93:14 93:17 158:11 158:14,22 159:13 160:2 160:6,8,20 161:1,10,19 led 121:1 Leduc 73:5,17 97:15 98:7,8 100:15,16 103:18 104:3 141:8,20 142:19 169:8 169:15,24 170:3,6,19 174:20 175:4 181:14 182:3 Leduc's 102:18 left 75:20 105:4 132:1 182:7 left-hand 76:5 legal 158:20 182:9 188:19 188:20 length 85:23 lengthy 141:23 letter 72:16,18 73:9,11,16 81:13 113:1,5 113:15,19 114:1,3,6,9 114:13 115:4 115:10,10,12 115:17,21 116:2,4,5,8 116:11 117:11,15	118:5,7,11,15 120:7,7,8 128:13 141:19 142:4 142:7 144:1 152:9 153:20 155:24 156:10 157:17 158:10 159:11 169:7 173:10 185:4 185:11 letters 96:23 let's 75:10 82:21 83:2 98:10 112:2 130:23 133:4 138:5 180:17 LEWIS 70:3 liability 160:13 limit 127:5,9,14 line 137:2 158:5 159:23 191:8 lines 128:11 Liorzou 97:12 98:13 list 108:7,10 109:15 110:5 110:10,11,12 110:16,19,22 110:24 111:10 listed 161:3 191:7 listen 85:6,9 little 108:15 137:7 159:24 live 172:23 lived 131:5 LLP 69:21 70:11 loan 186:20 loaned 186:24 local 112:4 location 180:2 logistics 99:14
K				
keep 79:14,15 88:23 kept 132:19 kilometers 131:7 kind 145:8 knew 164:8 know 73:15 76:22 85:12 98:15 99:14 99:14,15 102:6 103:9 103:11 104:17,18,21 107:10,14,24 108:1 110:6,9 110:10 111:8 114:2,3 115:5 116:3,18,22 117:3,12 118:12 121:9 121:10,13 123:13,21 126:6 128:23 132:15 143:8 144:21 145:8 145:9,10 146:19 149:4 153:15 155:3 157:3,10 158:8 160:16 160:22,23 161:6,7 167:2				
L				
L 69:17 76:10 111:5,6 192:5 192:18 Laboratories 87:11 92:19 92:20 97:10 100:24 120:9 130:11 131:5 136:5 137:21 140:9,10 142:11 163:21,23 167:12 172:6 177:9 182:24 183:15 Laboratorios 70:16 77:4,20 81:12,24 85:18 88:14				

long 113:4 126:4,14 145:17 147:8 159:22 170:11 190:3 longer 110:24 111:1 look 76:2 80:9 109:15 110:5 110:19 112:23 119:24 137:3 141:11 149:20 184:24 looks 185:2 loss 144:11 160:12 lost 139:6 lot 91:9 126:14 140:21 145:20 168:2 lots 162:1 love 119:13,15 Luis 131:22,24 lunch 103:8 133:1,18 181:13 Luncheon 133:8	98:15 135:3 management 169:4 manager 88:5 89:7 90:9,16 91:4 93:7 96:13,14 98:17 107:16 107:22 109:10 111:17 113:20 114:16,18,19 114:22 117:20 118:2 120:18 123:24 130:2 130:4 131:4 133:21 135:1 160:16 187:3 188:3 managers 124:12 manufacture 89:10 128:1,2 144:4 160:3 176:2,9 180:8 manufactured 87:11 88:1,16 88:19 91:1 manufacturing 79:16 80:13 85:19 96:22 120:5,13 122:12 125:22 127:5 129:15 131:6 131:8,15,16 132:8 135:11 143:6 145:15 174:8 176:6 178:5 187:13 Mar 111:21 March 125:6 142:12,17 143:12 175:21 187:14	Maria 111:6 mark 83:2 marked 83:5 106:8,11 112:20 114:11 117:16 119:19,22 128:17 136:19 141:6 141:9 147:14 152:21 154:2 156:2 157:17 165:4 166:23 167:2 169:8 market 122:10 122:11 143:21 150:20 151:10,23 marketing 90:22 91:6 101:1,18,21 156:21 Marques 70:19 Massachuse... 69:20,22 70:13 74:8 192:3,7 Mateo 129:2,5 131:11 185:6 189:21 material 76:23 77:2 160:9 matter 77:18 82:17 181:6 192:13 matters 82:18 134:23 meal 97:7,9,18 97:21 98:11 98:14 99:10 99:17,21 103:8,14,16 104:1,4 mean 106:15 125:11 142:14 151:2	159:6 160:11 173:20 meaning 116:5 171:22 means 104:20 107:19 134:6 134:11 159:1 171:20 meant 116:15 Medico 112:7 112:10 meeting 72:13 75:24 77:11 77:22 78:1,7 78:12,22,23 80:1 96:8,20 97:4,5,16,23 97:24 98:2,4 98:10 99:4,13 99:21 100:7,9 106:10 118:19 119:2 119:4,4,7 169:15,17,19 169:22 170:4 170:7,9,11,14 170:15,23,24 171:3,4,7 172:16,21 173:1,2 175:21,24 176:13,16,18 176:20 181:8 181:10,24 meetings 75:22 78:16 78:24 79:2 96:2 106:22 107:2 member 183:2 183:9 memory 80:5 107:6 110:18 166:12 170:6 mentioned 75:21 96:1 119:11 140:16 172:8	174:11 mentioning 123:6 Merck 184:9,16 message 137:2 137:8 method 80:14 methods 79:16 79:16 174:8,8 Michael 108:11 109:4 microgranul... 86:16 microgranul... 112:5 microgranules 87:10 129:6 129:15 micropellets 186:16 190:2 mid-positions 109:14 mid-2003 177:20 million 108:2 139:14,24 mind 75:4 126:22,24 127:1,2,4 minute 75:11 minutes 72:14 106:10,13,21 106:21 107:1 132:24 153:23 154:6 174:19 180:16 misappropri... 84:24 89:19 mistake 138:3 models 121:24 modifications 127:3 moment 76:2 82:22 91:7 118:18 120:11 130:24
---	---	---	--	--

M

M 96:18
machinery
144:3 176:9
Madrid 70:20
131:5,6,7
161:9 178:2
Madrid-CI
70:18
main 134:19
maintain
144:16
160:12
making 84:14
91:8,9,11,13
91:14,14
92:19,20,21

Page 204

143:22	136:7,9,12	187:5,21,23	153:2 154:10	92:7,9,14,17
144:19 163:7	137:13,17	188:15	November	99:23 109:8
172:8,20	141:8,16,20	negotiated	145:14 146:1	118:23 119:1
173:11,18	142:4,7,18,22	124:10	146:23	140:7 145:18
174:4,11,17	143:4,13,15	125:17	151:24	151:16 152:6
179:5 184:24	145:2,7,17	126:15 188:7	number 69:18	163:18
money 91:9,11	146:8,13	negotiation	74:4 81:6,6	164:11
91:13,14,15	147:13 149:5	122:21	81:23 83:3	180:10
91:23 92:19	149:9,12,14	136:12	86:4 105:22	184:17,21
92:20,21 93:4	149:17,22	152:12	106:3,11	objectionable
147:18 149:9	150:10 151:2	negotiations	112:20	75:8 81:9
149:18 168:8	155:2 164:6	120:24 123:5	114:11	84:3 94:5
186:20 187:1	176:12,18	124:16 136:1	117:16	objective
Monterde	179:7,9,13,19	136:5,16	119:19,23	135:24 136:4
131:22	179:23	172:11	120:14	obligated
month 79:11	183:15	182:21	128:18	168:8
126:10 145:9	187:20	net 139:9	133:11,16	observe 157:5
months 126:11	188:15	never 106:19	135:21	observed
152:5 153:12	Murphy's	106:21,23	136:20 141:9	178:18
Moran 111:7	135:17	117:7 141:5	145:13	obtain 112:9
Morano 111:7	136:15	188:24 189:4	147:15	147:10
morning 74:20	176:24	189:7,12	152:22 154:2	occasion 95:4
75:18,19		new 96:14	156:2 157:17	95:5,6 135:24
181:12	N	98:19,20	163:13 165:4	occasions
move 147:5	N 72:1 74:1	123:24	166:5 167:2	91:3 135:16
multiplicity	76:11 96:18	152:12	169:9 175:13	135:21 136:3
89:13	name 76:4,7	154:14	175:18	occurred
Murphy 72:17	111:4 136:15	155:12 173:8	188:10,13	178:20
73:4,6 75:22	139:6 162:12	173:12	190:15	October
94:11,18,21	181:4 186:12	181:20	numbers 83:5	136:19
94:23 95:16	190:2	news 117:9	140:14,16	offer 100:24
95:22 96:2	named 111:13	newspaper	numerous	offered 112:11
97:10 98:11	names 159:12	112:8,15	90:17,20	152:11 173:7
100:10 101:4	159:13	113:10	NW 70:4	173:8,9
101:14 103:2	Nancy 76:11	nonimportant	O	offering 173:11
103:17 105:2	native 87:2	104:17	O 74:1 162:14	office 124:19
105:12	nature 85:3	normal 108:8	object 159:7	169:20
108:16,23	133:20	136:11	188:16,21	offices 69:20
113:8 114:6	necessary	Notary 69:19	objected 83:22	101:4 131:5
114:10 115:6	147:18	192:6	objection 75:7	146:15
115:8,12	need 74:24	notebook	77:13,16 78:8	official 185:8
116:7 117:11	84:8 87:19	121:9	82:3 83:16	186:1
118:15,19,24	156:5 157:21	notepads	84:7,10 85:7	okay 79:9,24
125:4,5,8,10	165:7 187:20	74:23	85:9,21,23,24	80:2 81:5
126:2,18	needed 136:7	notes 75:1	86:19 88:18	90:23 93:14
130:9 134:3,8	137:16,20	192:12	89:1,1,12	101:3 103:6
134:12,16,22	179:1	notice 139:1	90:19 91:5,16	130:24
135:3,9,14,23	negotiate	151:24 152:3		157:23,23

165:1,9 166:5 172:17 174:1 174:18 175:6 179:22 omeprazole 76:19 77:2,4 85:15,19 86:17 88:1,15 89:11 91:1,23 93:24 96:22 96:23,24 102:9,14 112:5 113:11 121:19 122:2 122:15 129:17 139:10 140:1 147:6 148:12 150:6,6,14,14 153:5 154:15 156:11 157:1 160:4,7 161:21,23,24 163:16 164:9 166:6 176:6,9 180:9 once 92:24 112:14 164:2 164:17 165:6 ones 127:3 one-year 127:14,20,23 opened 101:15 operations 101:9 119:6 130:16,17 131:10 132:7 149:16 165:16 166:3 186:22 opportunity 173:12 opposite 149:19 option 108:2 options 107:7 107:11,14,22 108:4,8,20,24	109:1,7,7,17 110:7 111:17 orally 155:13 order 137:17 137:18 157:22 165:8 orders 177:13 177:13 organization 142:8,11 150:3 organize 124:1 organized 142:16 154:19 ourself 170:16 outside 106:15 106:17 125:1 overhead 101:17 owned 155:10 182:10 o'clock 181:12 P P 70:7 74:1 package 108:21 page 72:2,7 73:2 74:21 81:7,13 107:2 107:4 109:16 112:23 136:24 137:8 145:12 156:13 158:6 159:23 161:2 165:14,15,15 191:8 pages 112:10 156:18 PAINS 191:20 Palmer 69:21 70:11 Paloma 111:3 118:13 paper 75:1 paragraph	145:13 158:19 159:2 159:6,19 160:11 Paragraphs 128:6 Pardon 94:3 parent 93:13 107:20 172:7 172:11 Paris 98:2 169:20 181:20 part 79:6 124:21 138:9 150:4 151:17 154:19 169:4 partial 139:7 participate 123:4 167:21 participating 124:16 particular 84:5 84:20 parties 177:8 party 167:11 pass 74:22 passed 174:11 patent 86:7 147:10,10 148:14,16,17 148:19,21 184:8 patents 85:19 86:12 88:10 144:11 147:7 147:9,18,19 148:9 154:14 155:12 path 88:24 patience 190:12 Patrice 100:16 117:10 169:24 170:20,21 174:20 182:3 pause 175:10	pay 102:5 168:9 paying 102:3 payment 102:6 payroll 108:19 pelletization 113:10 186:13,15 pellets 88:1,15 91:1 153:6 PENALTIES 191:20 people 103:12 103:13,19,22 104:23 107:10 109:11,12,16 110:6,16,20 110:22,24 111:12,16,23 131:17,20 132:2,18 143:23 162:4 162:15,19 182:1 percent 93:8 93:11 138:13 138:15,18,21 139:9 151:20 Perfectly 120:3 perform 146:24 period 113:7 125:6,14,14 126:12,13,16 127:19 147:8 170:9 171:15 177:23 190:5 PERJURY 191:20 permission 137:20 187:20,23 188:14,24 permit 85:4 person 76:7 98:20 118:10 129:6,19	132:15 134:12 144:16 161:3 161:6,7 162:3 162:3 170:16 178:10,14,22 180:1 personal 123:20,22,23 129:20 186:4 personally 142:20 161:16 163:2 perspective 129:20 pertaining 82:10 84:5 Pfizer 184:10 184:12,13,19 pharmaceuti... 76:13 186:7 Pharmaceuti... 69:8 72:13 93:9 105:6 106:9,14 108:12,19 109:3 113:9 134:21 138:8 141:21 146:15 149:22 151:8 151:14,21 155:8 163:24 165:19 166:2 167:22 181:5 183:3,7,10,18 183:20 189:3 189:11 PharmAlliance 87:10 93:21 152:15,17,18 156:12,23 161:11,14,19 Phase 82:6,13 89:20 90:5 92:10 180:11 phone 94:14 94:20 121:6
--	---	---	---	---

Page 206

146:6,10 172:15 183:16 phrase 79:18 79:19 piece 74:24 Pierre 96:15,16 96:17 97:11 98:4,12 100:11,11 101:13 118:19 123:24 185:5 place 80:15 83:17 104:10 119:7 130:5 134:23 169:19 176:23 177:5 179:4,12 places 83:21 Plaintiffs 69:6 69:15 70:2 plan 99:24 150:4,16,19 150:21 151:1 151:1,2 154:19 planning 150:5 plans 147:6 plant 131:6,11 144:4 162:6 177:18,24 178:5 please 74:23 87:7 92:12 96:10 100:8 111:4 113:12 157:22 172:4 184:23 PLLC 70:3 point 81:3 82:9 82:12 83:15 129:22 133:2 136:14 151:11,22 153:8,23 160:1	policies 107:15 107:18 polite 115:21 116:5 portion 81:9 156:5 157:21 165:8 pose 84:10 position 90:8 102:18 positions 109:14 possibility 145:20 possible 117:5 119:5 power 130:18 130:18 powers 130:19 134:13 precisely 89:15 prefer 115:20 115:22 116:1 premise 77:17 preparation 106:16,17 169:2 prepared 150:10 presence 125:1 151:23 155:9 170:19 179:16 present 71:1 96:3 97:4,13 97:15 98:6 109:9 119:10 123:13 125:13 127:16 138:4 170:22 171:7 179:20 182:1 188:3 presented 138:1,2 140:13 173:6 preserve 92:14 92:17	president 94:22 106:20 108:11,17,22 109:2 125:20 125:20 130:11 134:5 135:5 137:21 143:8 146:5 150:18 151:12,19 164:2,3,6,18 165:24 166:17 167:24 183:15 press 73:8 112:4 154:2 pretended 81:15 previously 74:8,14 price 108:11 109:4 110:17 169:1 prices 177:15 prime 76:23 prior 86:6,11 93:15,19 99:1 117:1,6 145:20 169:15 probably 94:14 126:12 problem 121:18 171:8 172:5 182:18 problems 83:12 113:9 129:24 143:23 152:13 153:16 163:22 164:22 166:19,20 procedure 69:17 108:9 108:16	process 107:24 108:16 122:12,22 133:24 143:18 163:15 164:8 166:6 179:11 179:12 180:6 180:8 Produccion 72:9,10 produce 178:17 produced 107:1 110:2 156:16 171:14 product 77:2 80:13 102:10 102:12 127:6 140:11,12,21 140:22 150:19 177:10 production 72:11 77:4 productions 99:15 products 76:21 121:5,15 122:8,9,11 140:12 151:9 155:14 162:2 profit 146:24 profitable 140:6,22,24 141:2 progress 164:18 promised 89:15 properly 82:5 property 82:2 85:14 89:11 proposed 127:18 provide 95:22	124:24 141:2 provided 77:1 84:22 86:24 87:3 95:16 139:1 140:4 140:21 providing 135:9,17 181:9 provision 83:13 provisions 69:16 80:23 81:17 public 69:19 138:9 155:5 192:6 publication 154:20,21 publicly 138:10 published 112:10 purchase 76:19,21 purchasing 120:8 187:14 purports 159:11 purpose 77:9 159:17 171:2 pursuant 69:15 pursue 82:19 82:20 put 83:17,17 89:22 110:10 110:12 putting 84:14 85:16 180:3 p.m 133:6,10 133:15 155:18,21 163:9,12 175:12,17 180:20,24 190:18
				Q
				question 75:5

76:3 77:17,19 84:10,21 85:7 85:10,16,23 88:23 89:2,5 89:6,12,17,21 90:3,7,8 91:22 92:2,12 92:16,18 113:12,14 115:24 122:18 139:4 139:8 154:16 156:6 159:18 165:11 179:18 184:1 185:24 questioned 133:22 questioning 89:6 questions 82:15 83:18 84:4 88:9 107:5 157:22 165:9 181:6 188:19 quick 137:3 quite 92:14	real 80:11 reality 80:10 83:22 100:20 realize 82:6 really 145:21 159:9,14 178:12 reason 80:11 80:12 121:22 122:16 123:18 129:21 142:6 147:5 150:13 170:18 171:6 reasons 143:15,20,21 147:2 150:9 185:22 186:1 186:3,4,5 REBECA 70:21 recall 75:23 77:9,12,14 79:1,4 80:8 80:18,18,23 95:7,11,16,19 96:20 97:15 97:20 98:13 98:18 99:17 100:7 103:6 104:6,15 105:2,12 107:8 111:20 112:3,5,12 113:7,18,24 115:1 118:20 123:18 124:7 124:15 125:23 126:1 126:18 128:10,21 129:11 142:3 145:6 160:2 174:18 175:22,24 176:4,8 177:17 184:1 184:4,6 189:24	receipt 107:7 receive 109:7 111:1 received 107:11,14 109:17 110:7 142:7 receives 183:21 recess 75:15 83:1 105:24 133:8 155:19 172:12 180:22 recognition 81:15 recognize 113:5 117:18 120:2 128:19 152:23 154:7 156:7,8 158:3 159:9,12 165:11,13 167:4,5 169:10,12 recognized 144:8 recognizing 174:7 recollection 126:9 181:10 recommend 128:21 recommended 131:17 132:4 132:10 recontracting 166:7 record 75:12 75:14,17 82:22,24 83:8 83:14 84:7,14 84:16,18,20 88:12 96:18 123:7 125:24 133:4,6,7,13 155:18,21 163:7,9,10,12	175:15 180:18,20,21 180:24 191:6 192:12 refer 79:24 145:11,12 158:18 reference 121:4 referred 81:1 referring 119:4 121:14,15,17 126:2 163:13 reflect 80:10 refresh 107:6 regarding 80:19 112:4 113:16 144:22 185:16 188:20 register 150:5 Registered 69:17 192:5 192:19 registering 150:13 registration 151:4 regularized 142:14 regulated 142:8,10,14 relate 188:18 related 85:15 91:24 103:1 113:10 143:1 186:13 relates 139:24 relating 83:11 86:16 92:2,3 105:13 123:5 124:17 143:2 153:5 157:1 160:3 161:20 relation 88:21 121:16 relations 90:22	99:11 161:16 162:16,24 relationship 92:22 93:16 93:20 99:2,7 100:18 102:22 116:21 117:6 120:10 121:4 122:10,11,23 122:23 124:2 132:16 142:9 142:15 147:4 152:4 153:4 161:24 162:19 relationships 93:1 98:22,22 124:11 129:20 132:6 136:11 152:14 161:1 161:23 172:9 182:19 relaying 142:22 Release 73:8 154:2 released 155:5 relevance 184:17 relevant 92:4 159:19 remember 80:9 95:3,13,14,21 95:24 96:11 96:14 97:2,3 97:13,19 98:9 99:12,18 100:2,10 103:10,21 104:4,4 105:15 112:14 113:15,16 114:2,5,7 115:3,17 116:9 119:3
R R 74:1 96:18 111:5 162:14 191:1 RAFAEL 70:22 raised 82:16 82:18 83:9 114:5 raw 77:2 160:9 RDR 192:18 reached 177:7 reaction 177:3 read 81:4 87:19 92:12 92:16 113:14 139:4,7,20 162:10,11 174:13 191:3 reads 155:7				

Page 208

120:23 121:7	requested	131:8,9,9	S	100:11
123:8,9,14,14	172:12	132:13	S 72:6 73:1	109:23 113:6
126:4,6,8,20	188:14,24	144:16	74:1 76:10	121:6 127:15
126:20 127:8	requesting	154:20,21	salary 183:14	128:24 131:4
128:23 129:1	178:24 180:3	162:15,19	183:18	141:12,15
129:2,13	185:11	restaurant	sale 160:3,7	155:4 157:6
131:23	require 87:2	97:7,21 104:8	sales 138:13	159:16,19
132:12,20	131:12	104:16	138:16,19,22	161:4 165:16
135:19	required	174:23,24	139:10 140:1	165:17 166:5
141:18 142:5	108:22	restaurants	Sam 76:10	166:8 179:1
143:10 149:2	requiring	104:14	Sanchez 111:3	187:16
158:4 160:5	80:12	result 77:21,24	111:10	seen 89:14
160:17,21,24	research 148:5	144:11	Sandra 69:17	106:13,21,23
175:8,23	reserved 89:20	160:14	192:5,18	112:24
178:12,13,13	180:11	184:16,20	sat 103:21,22	113:15
182:7 184:2,5	resolve 171:8	return 172:24	satisfaction	114:13
186:12 190:2	177:7	173:2	162:7	141:13 166:2
remembered	resources	reveal 179:15	satisfactory	sell 102:7
75:22 127:13	147:21	revenue	100:20	140:10
128:3	respect 83:18	139:13,21,23	save 79:13	send 79:20
remove 144:2	87:1 88:7	RE-EXAMIN...	saw 109:24	108:7,10
renegotiating	89:17,17,18	189:14	178:18	117:3 121:23
163:15 164:9	89:21,24 90:6	right 90:7,18	saying 103:12	151:24
renegotiation	91:19 103:4	92:11 104:11	122:3 141:4	160:22
163:19	104:24 181:8	168:10	144:1 145:16	sending
164:12	182:10	171:23	175:24 176:4	118:16
renew 145:15	184:15,19	174:23 182:3	176:8	137:10,13
renewal 141:5	187:11	187:8	says 88:19	144:1 177:13
renewed 141:5	respond 103:2	ROBINSON	145:13	sense 142:21
repeat 113:13	115:12	70:3	158:21	sent 110:16
139:6	142:19	Rodriguez	165:16 166:5	117:11
reported 138:7	182:17	72:15 111:3	school 118:14	123:10
reporter 69:18	responded	112:19	scope 82:13	128:24
92:16 113:14	84:2,4 115:5	118:13	92:9	141:16,17
139:7 162:11	115:8 184:3	role 163:3	second 81:13	153:2,20
173:19 192:6	185:24	Roman 162:6	86:10 96:8	154:10
192:19	response	162:12,20	98:10,11	sentence
represent	114:17	room 172:18	99:21 136:24	155:7 166:8
106:24	115:10,16	174:16	156:13 158:5	September
representation	173:14 174:2	Rosa 111:21	161:2 165:15	79:11,21,22
134:15	175:3 176:24	Roseline 170:1	184:11	80:16 94:6
representati...	183:21	174:13,15	187:17	174:5,6
78:6,9,14,21	responsibilit...	182:5	secretary	serves 170:6
96:3	129:14	Rules 69:16	178:10,14,22	services
Representing	132:14	run 149:15,16	180:1	168:21,24
70:2,10,16	responsible	175:10	secrets 84:24	set 103:3
request 160:21	90:10 130:4	rush 123:16,19	89:19	104:14
186:20	130:15 131:8		see 85:7 86:5	192:10,15

short 126:12 126:13,16 132:22 170:9 171:15 190:5 shortly 141:17 show 106:7 112:17 113:20 114:8 115:4 117:14 119:16 128:15 136:17 147:12 152:20 154:1 155:22 157:16 165:1 166:22 169:6 174:4 showed 114:3 121:7 shown 114:17 115:18 Si 155:1 sic 80:15 side 73:11 76:5 86:20 109:23 157:17 158:10 159:11 sign 78:15 83:24 88:14 117:4,5 120:15 126:16 130:7 130:9 144:13 187:7,21,24 188:15 189:2 signatory 161:3 168:6 signature 86:4 123:7 157:6 158:5 159:23 signed 77:12 77:15,21,24 78:7 79:7,8 79:11 80:15 80:16 81:16 81:23 85:12	86:6,10 87:15 88:4 89:8,23 90:17,20 91:2 96:22 98:23 99:8 117:19 117:20 120:17,19 123:17,19 124:13 125:17,19,21 126:5 142:12 142:17 143:12 144:5 144:8 152:24 153:4,18 154:11 157:4 157:11 158:8 160:24 174:5 182:24 188:7 191:20 signing 78:17 83:10 96:24 121:1 126:22 144:12 signs 90:11 simply 82:15 165:9 Simvastatine 156:12 sit 79:1 97:18 104:7 sitting 97:21 103:24 104:2 situation 80:11 83:23 146:3 146:18 147:1 171:11 174:19 177:4 182:10 six 126:7,10 181:22 skill 192:14 slb 191:23 small 104:8,9 social 132:15 sold 102:9 sole 134:12 solicited	137:10 solution 172:22 somebody 131:2 160:22 161:8 soon 183:21 sorry 74:24 94:2 97:6 102:13 108:5 109:24 110:23 117:2 139:3,5,19 166:14,16 172:17 183:6 185:12 186:14 188:6 Sotola 161:4 sound 84:19 Spain 69:5 70:20 100:22 101:2,9,15,16 119:6 138:13 138:16,19,23 139:10,14 143:24 146:12 172:6 174:5 179:20 181:17,22 184:4 Spanish 74:10 74:11 87:20 93:2 113:9 118:10 119:8 124:12 155:11 172:9 182:20,22 188:21 speak 94:16,17 115:14 119:15 122:19 124:3 124:6 125:9 130:14 134:22 136:7 140:8,9 146:5 172:13 179:7 179:9 185:15	speaking 84:7 84:9 171:4 speaks 84:16 specialized 112:7 specific 78:16 80:5,19 81:1 81:18 89:5 91:6 99:5,16 107:5 113:16 121:13 123:6 129:16 145:6 151:22 161:18 specifically 85:14 102:24 130:12 131:23 142:24 150:16 171:5 171:21 183:13 specifics 95:11 98:18 123:8 speculation 151:17 speech 84:13 84:14,15 85:9 89:2 spell 76:9 111:4 162:12 spelled 76:16 76:16 spend 148:5 149:18 spending 149:9 spoke 94:14,21 94:23 103:7 146:10 179:18 spoken 105:5 133:20 SS 192:4 St 169:20 175:21 staff 169:2 stamp 83:3	standpoint 100:19 101:1 stands 84:7 126:21 start 149:1 170:14 started 86:5 98:21 starting 110:12 stated 82:1 146:7 147:3 150:2,2 168:10 176:23 statement 87:13 155:14 164:16 states 69:1 138:8 146:11 146:14 151:4 151:15 154:14,23 156:10 166:11 172:7 181:21 182:15 184:3 stating 90:24 statistics 138:7 stereotype 192:12 steps 146:3 Stewart 70:14 72:5 74:24 75:10 77:13 77:16 78:8 82:3,17 83:4 83:16 84:9,13 84:18 85:8,21 86:19 87:8 88:18 89:1,12 90:12,19 91:5 91:16 92:1,8 92:17 93:6 94:12 99:23 104:24 105:16 106:15 109:8
--	---	--	--	---

Page 210

109:19	submit 76:23	176:21 178:3	talk 75:11	120:1,4,24
118:23 119:1	108:18	sure 76:3 80:1	86:11 98:21	127:1 132:9
125:11	147:10 150:5	83:14 85:2	99:3,6 111:2	135:20 136:2
132:21	183:16	97:12 101:3	116:7 138:5	137:16
136:21 140:7	submitted	103:18	172:18	141:12 156:6
140:23	96:23 144:7	111:24	talked 96:5	159:18 167:6
145:18	155:12	122:17	100:2 115:4	168:13
151:16 152:6	submitting	123:21	115:18 145:1	176:20 178:9
153:22 154:4	144:10 174:7	132:23 148:8	talking 75:20	178:19
155:16 159:7	subsidiary	148:13 158:9	77:23 78:10	179:13,22
163:18	93:8,12	158:19 163:8	79:9 81:3	182:1 184:16
164:11	151:21	surprised	85:14 91:22	189:1,5,8
171:17	155:11	126:14	97:23 99:22	telling 121:3
179:14	substance	sworn 74:9,15	100:5 104:17	ten 98:24
180:10,15	82:5,8 84:23	192:11	109:9 110:8	109:11
181:1,4 183:6	84:23	system 182:23	124:9 126:7	132:24
184:13 188:5	sue 172:7	S.A 69:4,5	126:15	153:23
189:13	SUFFOLK	70:16 87:12	127:10,12	174:10
190:11	192:4		128:6 175:20	tenure 81:21
stick 130:23	suggest	T	182:19	130:2
stock 107:7,11	182:14	T 72:6 73:1	talks 86:7,13	tenured 130:13
107:14,21	suggestion	162:14,14	tape 74:3	term 163:18
108:2,4,20	105:19	191:1,1	105:22 106:2	terminate
109:1,7,17	suggestions	table 83:18	133:11,15	143:5 150:11
110:7 111:17	95:17	86:21 97:18	175:9,13,17	152:4 172:21
stop 144:4	Suite 70:5	103:22,23	190:15	terminated
stopping 133:2	summer 78:13	105:3,14	taxi 175:4	131:11,13
153:23	supplied	tables 97:22	technologies	160:18
stories 116:17	177:14	104:9,11	105:7,9 168:2	terminating
116:23,24	supplies 160:9	tablets 150:6	technology	143:23
Street 70:4	172:23	150:14	85:1,3,20	termination
strike 93:15	supply 125:22	tactic 136:13	86:8,13,16,17	93:15,19
99:19 102:1	135:12	take 101:8	87:12 88:2,10	130:24 139:2
123:3 125:9	164:22 173:8	105:17	88:16,20	152:1 153:20
144:24	173:13	118:18 119:7	89:10,24 91:2	154:11
167:20	supplying	119:24	105:5,6	169:16
stronger 99:9	99:14 156:21	130:16	116:18 167:8	171:14
studied 118:14	160:19,20	132:21 137:3	167:10,13,14	terminations
studies 146:24	163:22	141:11 144:3	169:3,5	130:5,8,10
147:23	166:19	146:4 154:5	171:24 176:1	terms 81:18
stuff 102:7	177:10,15	155:16	176:5 182:11	82:6 115:9
104:17	suppose	169:19	Tecnologia	123:16
subject 82:5	110:14 113:4	182:16	73:15 167:1	136:10 140:8
82:11 85:5	113:23	taken 69:15	telephone 95:7	144:23 162:7
165:16	141:18	100:1 134:23	tell 82:21 94:3	testified 74:17
182:22	146:16	177:5 183:24	95:7 96:8	85:11 159:8
subjects 105:3	154:18	192:12	100:8 105:2	184:6
180:11	164:20	takes 148:3	110:5,15,20	testimonio

133:23 testimony 74:15 85:22 92:23 130:3 133:19 168:3 187:10 191:4 191:6 thank 86:3 105:19 106:6 174:1 175:11 177:1 186:17 190:9,12,13 thanks 190:11 thing 128:13 128:23 143:24 144:18 146:21 173:7 173:7,9,12 things 104:21 126:24 128:11 136:9 145:1 164:3 think 82:9,11 98:1 115:20 116:4 122:19 131:2 132:5 134:10 138:1 138:2 141:1 143:18 145:9 153:14 157:7 158:1,9 170:20 177:21 178:11 185:3 thinking 100:22 101:16 144:20,21 170:12 third 98:1 99:19 112:23 156:13 161:12 thoroughly 144:21 145:22 thought 115:15	116:2 145:19 183:7 three 75:22 85:16 96:1 111:23 126:12 161:18 162:4 162:15 170:8 170:13 time 74:2 75:13 75:16 82:23 83:7,23 84:20 88:11 90:12 93:6 94:6,15 96:21 105:16 105:20 106:1 107:16 113:4 120:19,20 123:8,12 124:4 125:6 125:14,15,16 125:24 126:14,17 127:8 130:13 130:14,15 133:5,9,14 136:1,4,15 142:8 145:20 147:8,17 148:3,5 149:2 149:10,18 153:8 155:17 155:20 163:8 163:11 170:4 170:10 171:15 172:12 174:22 175:12,16 176:12 177:23,24 179:11 180:7 180:19,23 181:13,19,24 186:8,10 189:1,5,8,17 190:6,12,14 times 90:13	91:7 170:9 tiny 104:12,12 104:12 title 134:8 titled 72:8,10 72:11,19,21 73:14 119:18 119:21 166:24 today 79:1 88:13 155:10 160:7 162:5 165:23 190:10 told 80:21 101:7 105:12 121:14 122:4 136:6 137:22 149:15 top 109:12,14 185:3 topic 80:2 91:20 94:9 103:1 113:17 135:13 145:4 topics 82:3,8 146:20 touch 152:17 trade 84:24 89:19 traded 138:10 transcript 191:3,5 transdermal 167:16,18 transfer 101:18 101:22 102:4 102:6 167:8 167:12 169:5 Transferencia 73:15 167:1 transferred 167:11 translate 74:9 87:6,7 121:11 137:1,7 translated 118:11	translating 156:5 157:21 165:8 translation 86:23 136:21 185:3 translations 86:22 87:4 translator 71:2 74:7,12,22 75:2,19 87:6 87:9,19 97:6 98:8 101:20 102:12 105:8 108:5 110:23 115:23 118:22 119:10 127:10,13 133:22 134:2 137:1,7,9 139:5,16,21 140:24 148:15 156:19 158:1 158:20,23 161:12 171:19 183:5 184:11 186:15 187:16,18 188:4,6 transmitted 79:10 tried 98:20 173:21 Trivial 104:20 true 117:24 136:8 137:22 138:12 139:9 139:13 143:4 147:17 153:1 155:7,14 166:10 181:18 186:19 187:9 191:5 192:11 trust 144:11	146:22 truth 74:16,16 74:17 try 77:10,11 78:15 171:8 trying 91:7 112:8 145:19 172:20,22 179:2 turn 107:4 112:2 161:2 165:14 184:23 Turning 93:14 Tutor 162:6,13 162:20 twelve 109:11 two 99:2 109:23 111:23 117:8 119:2,16 120:10 124:2 124:12,12 126:12 127:9 127:16,20,21 128:13 132:2 132:3 156:17 170:8,12,20 176:22 184:8 type 152:13 167:14 types 78:19 104:21 <hr/> U U 76:17,17,17 111:6 162:14 Uh-huh 149:24 157:24 ultimately 103:14 157:10 umbrella 76:17 uncomfortable 174:16 understand 77:1 87:22 92:15 94:16
--	--	---	---	--

Page 212

101:14	usually 78:23	VS 69:7	175:10	150:24
102:16,17,17	112:8		180:20,24	writing 113:8
102:22	utilize 130:18	W	we've 80:1	119:12 185:9
111:12	U.S 139:14	walking 103:9	94:2 96:5	written 78:3
116:15	168:16	want 75:4,5	159:13	118:5 165:21
119:11 122:6	179:20	79:24 83:13	WHEREOF	wrong 81:8
127:22	U.S.A 137:24	88:12,23 89:4	192:15	84:22 164:16
133:24		90:1,6 115:23	wholly 155:10	wrote 76:5
141:19,22	V	129:22	willing 172:7	118:10
142:6 159:2,5	vague 99:23	130:22 134:3	wired 84:19	X
160:10	validations	154:4 158:18	witness 69:14	X 72:1,6 73:1
163:14 167:6	79:17	171:10	72:2 74:12,21	Y
171:6,21	vice 106:20	wanted 123:6	75:2 79:14	y 73:15 167:1
179:2	108:11 109:2	124:1 144:13	85:5 89:14,21	Yeah 126:24
understanding	165:23	Washington	90:2 91:17	year 98:3 110:9
117:8 138:12	Videographer	70:6	92:3 96:17	127:9,19,23
159:18 176:7	71:3 74:2	wasn't 97:5,17	108:3 148:20	131:21
182:14	75:13,16	132:13 136:8	149:24	138:15,21
183:12	82:23 83:7	way 88:24	151:18	139:1 142:13
185:10,23	105:20 106:1	107:24 110:2	157:24 159:8	144:6,14
understood	133:5,9,14	131:24 134:7	159:16	155:12
83:23 122:5	155:17,20	134:20	179:15	162:16,21,22
164:7 182:2,9	163:8,11	136:10 138:1	190:13 192:9	162:23
185:6	175:11,16	140:13	192:15	168:18,20
Unfortunately	180:19,23	149:10,18	won 184:18,22	177:12
163:4	190:14	153:21	word 133:23	183:18
unico 134:9,11	videotaped	156:16	133:24	years 89:9
United 69:1	69:13 74:4	188:18	139:22	109:7 126:7
138:8 146:10	105:22 106:3	week 126:10	words 102:9	127:9,17,21
146:14 151:4	133:11,16	190:6	104:19	128:14 129:9
151:15	175:14,18	weeks 126:13	107:17	168:19
154:13,23	190:16	Welcome	111:22	174:10
172:7 181:21	view 116:10	106:5 133:18	128:11 136:2	yesterday
182:15 184:3	151:11	went 98:2,5	136:6 141:1	75:20 107:8
upcoming	Vincamine	100:11	165:16	183:23
183:18	97:1 120:21	103:14,16	work 147:18	yes-or-no 90:8
update 165:17	121:17	121:6 172:12	149:1 161:17	Yves 97:12
166:3	visit 123:1	172:17	working	98:12
upset 104:6	178:18,22,24	174:22 175:4	124:19,19	Z
112:12,14	179:6 180:7	177:18	129:6,16,23	Z 111:5
Uquifa 76:15	visited 180:2	weren't 148:13	129:24 147:8	Zaragoza
76:18,21 77:1	visitor's	we're 75:14,17	186:6,8	131:7 161:9
158:11,14	189:19,22	82:12,24 83:8	189:16,17	177:18,24
160:3,6,8,23	Volume 74:4	91:22 109:9	worse 132:17	Zarnetske 71:3
161:10,19	105:22 106:3	116:17 126:7	wouldn't	
use 171:23	133:11,16	133:6 155:18	121:17	
176:1,4,8	175:13,18	155:21 163:9	write 75:4,6	
usual 125:19	190:16	163:12	118:7 119:14	